

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

BARFLY VENTURES, LLC, *et al.*¹
Debtors.

Chapter 7
Hon. James W. Boyd
Consolidated
Case No. 20-01947

**FIRST INTERIM FEE APPLICATION OF TAFT STETTINIUS & HOLLISTER, LLP
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THOMAS BRUINSMA, CHAPTER 7
TRUSTEE OF BARFLY VENTURES, LLC, ET AL. FOR THE PERIOD
FROM MAY 19, 2021 TO AUGUST 31, 2023**

Taft Stettinius & Hollister, LLP (the “Applicant” or “Taft”), submits this First Interim Fee Application of Taft Stettinius & Hollister, LLP For Payment of Compensation and Reimbursement of Expenses as Counsel to Thomas Bruinsma, Chapter 7 Trustee (“Trustee”) of Barfly Ventures, LLC, et al. for the Period from May 19, 2021 to August 31, 2023 (the “Application”), and respectfully states as follow:

CASE BACKGROUND AND STATUS

1. On June 3, 2020 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under Chapter 11 (collectively, the “Barfly Cases”).

¹ The substantively consolidated debtors are: Barfly Ventures, LLC (8379), Barfly Management, LLC (6274), 9 Volt, LLC (d/b/a HopCat) (1129), 50 Amp Fuse, LLC (d/b/a Stella’s Lounge) (3684), GRBC Holdings, LLC (d/b/a Grand Rapids Brewing Company) (2130), E L Brewpub, LLC (d/b/a HopCat East Lansing) (5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago, LLC (7552), HopCatConcessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat-GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat-Indianapolis, LLC (d/b/a HopCat-Broad Ripple) (7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a HopCat,-KC, LLC and Tikicat) (6242), HopCat-Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), HopCat-Royal Oak, LLC (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House, LLC and McFadden’s Restaurant Saloon) (4255).

2. On June 9, 2020, the Barfly Cases were consolidated for administrative purposes in the *Order (I) Directing Joint Administration of the Debtors' Chapter 11 Cases and (II) Granting Related Relief* [Doc. No. 60].

3. On October 21, 2020, the Court entered the *Amended Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief* (the "Sale Order") [Doc. No. 376].

4. The Sale Order was one component of a mediated resolution of various issues by and amongst the Debtors, their secured creditors, and the Official Committee of Unsecured Creditors (the "Committee"). Pursuant to the mediated resolution, it was agreed that: (i) instead of trying to confirm a liquidating plan, the sale would be approved and all chapter 11 administrative claims would be paid, and then the cases would be converted to chapter 7; (ii) a pool of funds in the amount of \$225,000 would be set aside and carved out from the secured lender's collateral to enable a chapter 7 trustee to investigate and, if appropriate, to pursue causes of action as at that point no real investigation of potential causes of action had been conducted during the chapter 11 case; and (iii) after closing of the sale, the Barfly Cases would be substantively consolidated and converted to a case under chapter 7, at which time a trustee would be appointed to investigate and, in his discretion, to pursue claims and causes of action held by the Debtors' estates. Notwithstanding the lack of a prior investigation, all of the parties thought that an investigation was appropriate and needed in light of allegations raised about Mark Sellers and significant funds that he received from the Debtors prior to the Petition Date.

5. On May 18, 2021, the Court entered the *Order Converting the Debtors' Chapter 11 to Chapter 7, Rejecting Executory Contracts and Granting Other Relief* [Doc. No. 486]. Pursuant to that order, the Debtors' bankruptcy case was converted to a case under chapter 7 and Thomas Bruinsma was appointed to serve as the interim chapter 7 trustee.

6. After being appointed and retaining Taft, as his counsel, and Rock Creek Advisors ("Rock Creek"), as his financial advisors, the Trustee directed Taft and Rock Creek to undertake an investigation of potential causes of action to be pursued against Mark Sellers, Michele Sellers (the ex-wife of Mark Sellers), and the managers, members, directors and officers of the Debtors. In addition, the Trustee directed counsel and Rock Creek to review transfers made by the Debtors during the 90-day and 1-year periods preceding the Petition Date to ascertain if any of the disclosed transfers were subject to avoidance and recovery as preferential transfers under Section 547 of the Bankruptcy Code.

7. While Taft actually incurred all of the fees and expenses for which compensation is sought in this Application and believes that all of the fees and expenses incurred were necessary, fair and reasonable, at the current time, there are insufficient funds in the estate to cover the fees and expenses of Taft and Rock Creek.

8. In order to pay in full the remaining administrative and priority claims of the estate (some of which had allegedly remained unpaid when the cases were consolidated and converted to chapter 7), Taft and Rock Creek have agreed to reduce the amount of their fees to be paid as part of this Application by 50% and to have all of their expenses paid in full, other than the expert fees and costs owed to David J. Distel from Gantry Business Solutions, LLC, n/k/a Distel Thiede Advisory Services, LLC. ("Distel") retained as an expert by counsel to assist with various issues related to the Adversary Proceeding (as defined below in paragraph

21(A)(iii)). Contemporaneously, with the filing of this Application, Rock Creek is also filing its First Interim Fee Application that will reflect the same proposed compromise of its fees and expenses. In addition to this compromise of fees, Taft wrote off a substantial sum of attorney fees that are not reflected in the fee reduction described. With respect to Distel's expert fees and costs, Distel has also agreed to reduce the amount of his fees to be paid as part of this Application by 50%, the same percentage amount as agreed to by Taft and Rock Creek, with his expenses being paid in full.

9. The estate still remains open in order to address, resolve or object to certain claims filed as secured, administrative and priority claims. Counsel is assisting the Trustee in the resolution of these claims and, if the claims are unable to be resolved, to prepare and to file objections to such claims. In addition, the Trustee is continuing to collect amounts owed to the estate by Mark Sellers pursuant to his confirmed individual chapter 11 plan. As a result, until such payments are fully made and all claims resolved, the Trustee will be unable to close the estate.

10. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1334(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A)(C) and (O).

11. Taft files this Application pursuant to such order and 11 U.S.C. § 330 and 331.

REQUEST FOR COMPENSATION

12. By this Fee Application, Taft seeks allowance of compensation in the amount of \$601,718.00 and reimbursement of expenses in the amount of \$40,255.13 in connection with professional services rendered to the Trustee during the post-petition time period of May 19, 2021 to August 31, 2023 (the "Compensation Period"). Attached as **Exhibit 1** is a proposed

order approving Taft's fees requested in this Fee Application. Attached as Attached as **Exhibit 2** is the order authorizing Taft's employment as Trustee's counsel.

13. Additionally, in connection with professional services rendered to the Trustee in these cases during the Application Period, Taft seeks allowance of an administrative expense pursuant to section 503(b)(2) in the amount of \$641,973.13, which consists of compensation in the amount of \$601,718.00 and reimbursement of expenses in the amount of \$40,255.13.

14. Attached as **Exhibit 3**, is a chart of the hourly rates² for the attorneys and paralegals that performed services in this matter during the Application Period. These rates are comparable to, or lower than, rates charged by other practitioners having the same level of experience, expertise, and standing for similar services. Taft consistently and consciously made every reasonable effort to represent the Trustee in the most economical, efficient, and practical manner possible.

15. Since the date this case was converted to chapter 7, Taft has been paid a total of \$0.00 in fees, and \$0.00 in expenses from the chapter 7 estate.

16. The fees and expenses incurred by Taft during the Application Period are as follows:

Monthly Period	Fees	Expenses	Total Fees & Expenses
May 2021	\$10,392.50	\$196.12	\$10,588.62
June 2021	\$16,609.00	\$150.62	\$16,759.62
July 2021	\$10,426.00	\$268.28	\$10,694.28
August 2021	\$17,402.50	\$775.62	\$18,178.12
September 2021	\$16,882.50	\$0.00	\$16,882.50
October 2021	\$35,851.00	\$4,454.02	\$40,305.02
November 2021	\$21,963.00	\$167.53	\$22,130.53
December 2021	\$6,611.50	\$2,727.31	\$9,338.81
January 2022	\$10,156.50	\$1,665.85	\$11,822.35
February 2022	\$30,848.00	\$3,086.07	\$33,934.07
March 2022	\$21,731.00	\$3,594.00	\$25,325.00
April 2022	\$35,822.00	\$1,487.70	\$37,309.70

² Taft's hourly rates are reviewed and modified on an annual basis.

May 2022	\$37,675.00	\$2,211.36	\$39,886.36
June 2022	\$1,251.00	\$1,556.70	\$2,807.70
July 2022	\$2,967.50	\$1,489.50	\$4,457.00
August 2022	\$13,199.50	\$281.63	\$13,481.13
September 2022	\$17,682.00	\$1,589.42	\$19,271.42
October 2022	\$34,582.00	\$2,212.75	\$36,794.75
November 2022	\$49,871.00	\$1,951.97	\$51,822.97
December 2022	\$54,873.00	\$6,033.13	\$60,906.13
January 2023	\$103,061.00	\$4,138.23	\$107,199.23
February 2023	\$5,440.00	\$182.22	\$5,622.22
March 2023	\$4,595.00	\$3.90	\$4,598.90
April 2023	\$2,660.00	\$0.00	\$2,660.00
May 2023	\$385.00	\$0.00	\$385.00
June 2023	\$7,453.00	\$0.00	\$7,453.00
July 2023	\$5,325.00	\$0.00	\$5,325.00
August 2023	\$26,002.50	\$31.20	\$26,033.70
Total	\$601,718.00	\$40,255.13	\$641,973.13

17. Attached to this Fee Application as **Exhibit 4**, are detailed monthly statements of the fees and expenses incurred during the Application Period (the “Monthly Statements”) plus summaries of fees and expenses incurred for each matter, hours incurred by each professional and a detail of disbursements incurred. The time described in the Monthly Statements represents the actual amount of time spent or, in certain instances, less than the actual amount of time spent by Taft attorneys and paralegals who rendered the services described. Certain time reflected in the Monthly Statements has been either reduced or eliminated by Taft to reduce the burden on the estates related to multiparty conferences or to other services deemed in hindsight to warrant adjustment.

18. A detailed biography of the attorneys and paralegals that performed services in this matter is attached as **Exhibit 5**.

19. A summary of Taft’s expenses is attached as **Exhibit 6**.

20. Taft professionals expended significant effort during the Application Period to ensure the successful administration of these chapter 7 cases. On behalf of the Trustee, Taft assisted with investigating certain claims and causes of action belonging to the Debtors' estates and took efforts to preserve such claims and causes of action for the benefit of the estate, reviewed and addressed objections to claims, and addressed various other issues consistent with their duties as counsel for the Trustee. Accordingly, the time spent and expenses incurred during the Application Period were necessary and appropriate under the circumstances.

21. The services rendered by Taft during the Application Period are grouped into various categories, and the attorneys and paraprofessionals who rendered those services are identified—along with the number of hours spent by each individual and the total compensation sought for each category—in the attached **Exhibit 7** to this Fee Application. Brief descriptions of the services rendered by Taft during the Application Period, by category, follow:

A. *Asset Analysis and Recovery*

Taft spent 1,295.90 hours analyzing and seeking to preserve potential causes of action belonging to the Debtors' estates which may be pursued by the Trustee. This includes time spent negotiating and obtaining extensions of the deadline for the Trustee to commence a non-dischargeability adversary proceeding against Mark Sellers and pursuing objections to claims filed by Mark Sellers and responding to objections to claims filed by the Committee in Mark Sellers's individual chapter 11 proceeding, as well as commencing an adversary proceeding against Mark Sellers, Michele Sellers and Barfly Management, LLC, all as further detailed below.

(i) *Investigation and Pre-Filing Discovery*

Prior to commencing litigation, counsel for the Trustee engaged in pre-filing discovery

that included, among other things, (i) preparing an application under Bankruptcy Rule 2004 for production of documents by Innovo Development Group (“Innovo”), one of the Debtors’ landlords, in order to address and to consider whether claims should be asserted against Innovo in connection with their leases (all of which had been rejected/terminated prior of during the chapter 11 case); (ii) preparing an application under Bankruptcy Rule 2004 for production of documents and an examination against Mark Sellers in order to ascertain if potential causes of action existed against Mark Sellers, Michele Sellers, some of the affiliates of the Debtors and other directors and officers; (iii) interviewing prior officers and directors of the Debtors and representatives of the secured lenders of the Debtors; (iv) reviewing Debtors’ extensive books and records dating back to 2008; (v) reviewing voluminous e-discovery produced by the company that acquired substantially all of the Debtors’ assets in the 363 sale conducted during the chapter 11 cases; (vi) reviewing voluminous e-discovery produced by Mark Sellers; and (vii) conducting an examination of Mark Sellers pursuant to Bankruptcy Rule 2004. By way of information, hundreds of thousands of e-discovery documents were produced in the course of this pre-filing discovery.

(ii) *Settlement with Mark Sellers*

Mark Sellers filed claims for severance and other amounts he claimed were due to him in the Barfly Cases. The Committee filed a claim against Mark Sellers in his individual chapter 11 case for amounts owed to the estate in connection with disbursements made by the Debtors to Mark Sellers prior to the Petition Date for payment of his personal obligations owed to his ex-wife, Michele Sellers, under a divorce decree and settlement agreement, as well as for other asserted violations of his fiduciary duties to the Debtors. Counsel for the Trustee filed objections to Mark Sellers’s claims, and Mark Sellers lodged an objection to the Committee’s proof of

claim. In addition, the date for filing a nondischargeability complaint against Mark Sellers was extended in order to allow the Trustee to determine whether factual and legal bases existed to pursue such a claim.

Ultimately, following the Debtors' conversion to chapter 7, Mark Sellers and the Trustee were able to effectuate a settlement of each of the respective claims and resolved the dischargeability issues. Counsel prepared an application pursuant to Bankruptcy Rule 9019 that was ultimately approved by the Court. As part of the settlement, Mark Sellers agreed to cooperate with the Trustee in his ongoing investigation and to appear for an examination under Bankruptcy Rule 2004. In addition, the Trustee reserved the right to name Mark Sellers as a party defendant in potential litigation to be pursued against others (as further detailed in subparagraph (iii) below).

(iii) *Commencement of Adversary Proceeding Against Mark Sellers, Michele Sellers, Barfly Management LLC and Mark Gray*

The Trustee commenced an adversary proceeding against Mark Sellers, Michele Sellers, Barfly Management, LLC ("Barfly Management") and Mark Gray for various causes of action, including (i) alleged breaches of the fiduciary duties of care and loyalty against Mark Sellers, Mark Gray and Barfly Management; (ii) avoidance and recovery of alleged fraudulent conveyances under Sections 544, 548 and 550 of the Bankruptcy Code and applicable state law against Mark Sellers and Michele Sellers; (iii) avoidance and recovery of alleged preferences under Sections 547 and 550 of the Bankruptcy Code against Michele Sellers and Mark Sellers; and (iv) invalidating the loan between Mark Sellers and Barfly Ventures, LLC whereby payments were transferred to Mark Sellers for disbursement to Michele Sellers to fulfill his personal obligations under their divorce decree and judgment.

After the complaint was filed and served, counsel reviewed and analyzed the answers and affirmative defenses to the complaint and participated in numerous discussions with counsel for the defendants. Counsel also reviewed and prepared answers to discovery (requests for production of documents, interrogatories and requests to admit) propounded by the defendants. Counsel also prepared discovery (requests for production of documents, interrogatories and requests to admit) that were served on the defendants. Counsel also deposed Mark Gray and Michele Sellers.

Counsel also reviewed and analyzed various letters, memos and other documents about the various legal issues raised in the Adversary Proceeding. Counsel also appeared at and participated in an initial scheduling conference for the Adversary Proceeding, at which time, all of the parties agreed to mediate the claims subject to the Adversary Proceeding. A mediator was selected and a mediation date was selected. Prior to the mediation, each of the parties prepared extensive mediation briefs. Counsel prepared the mediation brief on behalf of the Trustee and reviewed and analyzed the mediation briefs submitted by the defendants in preparation for the mediation.

Prior to the mediation, counsel for the Trustee engaged in settlement discussions with counsel for Michele Sellers. Numerous telephone conferences and written documentation was exchanged between the parties, but unfortunately, they were not able to resolve the claims at issue prior to the mediation.

Numerous other issues were dealt with by counsel for the Trustee, including addressing the extent to which the insurer could deduct amounts from the Directors and Officers Insurance Policy to pay the fees and costs of the defendants' counsel, as further delineated in the exhibits attached to this Application.

(iv) *Settlement of Adversary Proceeding*

After a day-long mediation conducted in Grand Rapids, the parties were able to resolve the claims asserted in the Adversary Proceeding. Counsel for the Trustee drafted and filed a motion under Bankruptcy Rule 9019 that was ultimately approved by the Court, thereby resolving the Adversary Proceeding which, pursuant to the court approved settlement, was dismissed.

B. *Case Administration*

Taft spent 21.20 hours related to the administration of the chapter 7 cases during the Application Period. This category includes communicating with other estate professionals and responding to questions of creditors regarding the status of the cases.

C. *Claims*

Taft spent 53.90 hours during the Application Period reviewing the Debtors' schedules of assets and liabilities, reviewing claims filed in this chapter 7 case and objecting to or otherwise resolving or addressing such claims.

D. *Disbursements*

Taft used this category to report all disbursements made during this chapter 7 case, all of which are detailed in paragraph 23 below.

E. *Fee Application*

Taft spent 28.90 hours during the Application Period preparing this Application and reviewing and addressing issues with respect to the applications filed by other professionals of the Trustee.

F. *Employment*

Taft spent 18.00 hours during the Application Period preparing applications to approve the retention of professionals of the Trustee and, when and as applicable, to supplement declarations of disinterestedness.

G. *PPP Loan Forgiveness*

Taft spent 2.40 hours during the Application Period to address the PPP Loan obtained by the Debtors prior to the Petition Date and issues related to forgiveness of that loan.

22. Taft submits that the compensation sought under this Fee Application represents a fair and reasonable amount for the services rendered during the Application Period, given the criteria set forth in section 330 for evaluating applications for compensation, namely:

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

23. Detailed itemizations of all expenses incurred during the Application Period are set forth in the Monthly Statements and further summarized in attached **Exhibit 8**. Expenses during the Application Period were incurred in the following categories:

A. *Photocopying*

As set forth in the Monthly Statements, Taft incurred copying and printing charges totaling \$1,530.00 during the Application Period. Taft charges clients \$0.15 per copy.

B. *PACER and CM/ECF Charges*

As set forth in the Monthly Statements, Taft incurred charges for use of the Court's PACER and CM/ECF system in the amount of \$4,350.05 during the Application Period.

C. *Postage Charges*

As set forth in the Monthly Statements, Taft incurred postage charges totaling \$943.92 during the Application Period.

D. *Discovery Fees*

As set forth in the Monthly Statements, Taft incurred Discovery Fees for e-Discovery and for deposition transcripts in the amount to \$31,447.32 during the Application Period.

E. *Mileage*

As set forth in the Monthly Statements, Taft incurred Mileage Fees in the amount of \$182.22 during the Application Period.

F. *Westlaw*

As set forth in the Monthly Statements, Taft incurred Westlaw Fees in the amount of \$1,801.62 during the Application Period.

G. Conference Calls

As set forth in the Monthly Statements, Taft incurred Conference Call Fees in the amount of \$50.51 during the Application Period; provided, however, Taft is not seeking reimbursement for these fees, as further provided in paragraph 24 below.

H. Expert Witness Fees

After the Adversary Proceeding (as described in paragraph 21(A)(iii) was commenced, counsel retained Distel as an expert to assist with various issues related to the Adversary Proceeding. Mr. Distel prepared various analyses regarding solvency, valuation and other issues raised or associated with the Adversary Proceeding and also participated in the mediation. Distel's retention as an expert in this matter was crucial and essential for counsel to adequately and fully represent the Trustee in the Adversary Proceeding.

Detailed time and expense records for the time and costs incurred by Distel, Mr. Distel and his associates in connection with this engagement are attached as **Exhibit 9-A** hereto. Distel incurred fees in the amount of \$39,686.67 and costs in the amount of \$1,641.67 during the period of November 10, 2022 to January 23, 2023. A breakdown of the individuals at Distel that performed services for this engagement and their hourly rates are set forth in attached **Exhibit 9-B**. Biographies of the individuals that performed the services at Distel are attached as **Exhibit 9-C**. Distel spent 127.45 hours in serving as an expert in this matter. Distel's fees and costs associated with serving as an expert in this matter are included within the breakdown of Taft's fees and expenses.

24. All expenses incurred by Taft in connection with its representation of the Trustee were ordinary and necessary expenses. All expenses billed to the estates were billed in the same manner Taft bills its non-bankruptcy clients. Taft does not bill its clients or seek

compensation in this Fee Application for certain overhead expenses, such as local and long-distance telephone calls, secretarial services and facsimile transmissions. Such expenses are factored into Taft's hourly rates.

25. In compliance with Bankruptcy Rule 2002(a)(6), Local Bankruptcy Rule 2016-2(c), and the Compensation Order, Taft will provide notice of this Fee Application through the Court's ECF system to: (a) the Office of the United States Trustee for the Western District of Michigan, (b) parties who have filed a notice of appearance with the Clerk of the Court and requested notice of filings in these cases, and (c) creditors listed on the matrix. Taft submits that, in light of the nature of the relief requested, no other or further notice need be provided.

26. A proposed order granting the relief sought in this Application is attached as **Exhibit 1**.

WHEREFORE, Taft respectfully requests that this Court enter an order substantially in the form attached as **Exhibit 1** to this Fee Application:

- (a) Allowing and approving, on an interim basis, an administrative expense in the amount of \$641,973.13, consisting of \$601,718.00 for actual and necessary fees and \$40,255.13 for expenses (exclusive of expert fees for Distel) incurred by Taft during the Application Period;
- (b) Authorizing the Trustee to pay Taft fees in the amount of \$300,859.00 and expenses in the amount of \$40,255.13 approved by the Court pursuant to this Application;
- (c) Approving and allowing, on an interim basis, an administrative expense in the amount of \$39,686.67, consisting of \$38,045.00 for actual and necessary fees and \$1,641.67 for expenses incurred by Distel during the Application Period;
- (d) Authorizing the Trustee to pay Distel \$19,022.50 for fees and \$1,641.67 and expenses in the amount of \$20,664.17 approved by the Court pursuant to this Application; and
- (e) Granting Taft with such additional relief as may be just and appropriate under the circumstances.

Respectfully submitted by,

TAFT STETTINIUS & HOLLISTER, LLP

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*Counsel to Thomas Bruinsma, in his capacity as
Chapter 7 Trustee of Barfly Ventures, LLC, et al.*

Dated: October 2, 2023

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

BARFLY VENTURES, LLC, *et al.*³
Debtors.

Chapter 7
Hon. James W. Boyd
Consolidated
Case No. 20-01947

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023, my office electronically filed the *First Interim Fee Application of Taft Stettinius & Hollister, LLP for Payment of Compensation and Reimbursement of Expenses as Counsel to Thomas Bruinsma, Chapter 7 Trustee for Barfly Ventures, LLC, et al. for the Period of May 19, 2021 through August 31, 2023* with the Clerk of the Court which sends notice by operation of the Court's electronic filing service to all ECF participants registered to receive notice in this case.

³ The substantively consolidated debtors are: Barfly Ventures, LLC (8379), Barfly Management, LLC (6274), 9 Volt, LLC (d/b/a HopCat) (1129), 50 Amp Fuse, LLC (d/b/a Stella's Lounge) (3684), GRBC Holdings, LLC (d/b/a Grand Rapids Brewing Company) (2130), E L Brewpub, LLC (d/b/a HopCat East Lansing) (5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago, LLC (7552), HopCatConcessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat-GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat-Indianapolis, LLC (d/b/a HopCat-Broad Ripple) (7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a HopCat,-KC, LLC and Tikicat) (6242), HopCat-Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), HopCat-Royal Oak, LLC (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House, LLC and McFadden's Restaurant Saloon) (4255).

Respectfully submitted by,

TAFT STETTINIUS & HOLLISTER, LLP

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*Counsel to Thomas Bruinsma, in his capacity as
Chapter 7 Trustee of Barfly Ventures, LLC, et al.*

Dated: October 2, 2023

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN**

In re:) Chapter 7
) Hon. James W. Boyd
 BARFLY VENTURES, LLC , et al.,¹) Jointly Administered
) Case No. 20-01947-jwb
 Debtors.

EXHIBIT LIST

<u>Ex. No.</u>	<u>Description</u>
1	(Proposed) Order
2	Order Authorizing Employment of Taft as Counsel for Chapter 7 Trustee
3	Attorney and Paralegal Hourly Rates
4	Monthly Fee Statements
5	Biographies of Taft Attorneys and Paralegals
6	Summary of fee Application
7	Summary of Statements
8	Monthly Statements of Expenses
9A	Distel Time and Expenses
9B	Distel Hourly Rates
9C	Distel Biographies

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EXHIBIT 1

**(Proposed Order Approving First Interim Application of Taft Stettinius & Hollister, LLP
for Compensation & Reimbursement of Expenses as Counsel to Thomas Bruinsma, As The
Chapter 7 Trustee of Barfly Ventures, LLC, et al.)**

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In Re:

BARFLY VENTURES, LLC, *et al.*¹

Debtors.

Chapter 7
Case No. 20-01947-jwb
Hon. James W. Boyd
Consolidated

/

**ORDER APPROVING FIRST INTERIM APPLICATION OF TAFT
STETTINIUS & HOLLISTER, LLP FOR COMPENSATION &
REIMBURSEMENT OF EXPENSES AS COUNSEL TO THOMAS BRUINSMA,
AS THE CHAPTER 7 TRUSTEE OF BARFLY VENTURES, LLC, ET AL.**

This matter came before the Court on the *First Interim Application of Taft Stettinius & Hollister, LLC for Compensation & Reimbursement of Expenses as Counsel to Thomas Bruinsma, as the Chapter 7 Trustee of Barfly Ventures, LLC, et al.* (the “Fee Application”)² filed by Taft Stettinius & Hollister, LLP (“Taft”); notice of the Fee Application is sufficient and consistent with the Compensation Order; and no objections to the Fee Application were filed or all such objections have been resolved, the Court has read same and is otherwise fully and duly advised in the premises:

IT IS HEREBY ORDERED:

1. The Fee Application is granted.

¹ The Debtors are: Barfly Ventures, LLC (8379), Barfly Management, LLC (6274), 9 Volt, LLC (d/b/a HopCat)(1129), 50 Amp Fuse, LLC (d/b/a Stella’s Lounge)(3684), GRBC Holdings, LLC (d/b/a Grand Rapids Brewing Company)(2130), E L Brewpub, LLC (d/b/a HopCat East Lansing)(5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago, LLC (7552), HopCat-Concessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat-GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat-Indianapolis, LLC (d/b/a HopCat-Broad Ripple)(7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a HopCat-KC, LLC and Tikicat)(6242), HopCat-Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), HopCat-Royal Oak, LLC (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House, LLC and McFadden’s Restaurant Saloon)(4255).

² Capitalized terms not otherwise defined herein shall have the meaning given to them in the Application.

2. The fees and expenses allowed and paid pursuant to this Order are allowed and approved on an interim basis.

3. Taft is granted an allowed administrative expense under section 503(b)(2) for \$641,973.13, consisting of \$601,718.00 for actual and necessary fees and \$40,255.13 for expenses incurred by Taft during the Application Period (exclusive of the expert fees owed to Distel).

4. The Trustee is authorized and directed to promptly pay Taft fees in the amount of \$300,859.00 and expenses in the amount of \$40,255.13 (exclusive of the expert fees owed to Distel) allowed under this Order.

5. The expert fees of Distel in the amount of \$39,686.67, consisting of \$38,045.00 for actual and necessary fees and \$1,641.67 for expenses incurred by Distel during the Application Period are approved as an administrative expense under section 503(b)(2),

6. The Trustee is authorized and directed to pay Distel \$19,022.50 for fees and \$1,641.67 for expenses in the amount of \$20,664.17 allowed under this Order.

7. This Court retains exclusive jurisdiction to resolve any dispute arising from or related to this Order.

END OF ORDER

Order prepared and submitted by:

TAFT STETTINIUS & HOLLISTER, LLP
Judith Greenstone Miller (P29208)
Paul R. Hage (P70460)
Kimberly Ross Clayson (P69804)
27777 Franklin, Suite 2500
Southfield, Michigan 48034
Phone: (248) 351-3000
jgmiller@taftlaw.com
phage@jaffelaw.com
kclayson@taftlaw.com

*Counsel for Thomas Bruinsma, the Chapter 7
Trustee of Barfly Ventures, LLC et. al.*

EXHIBIT 2

(Order Authorizing Employment of Taft as Counsel for Chapter 7 Trustee)

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

BARFLY VENTURES, LLC, *et al.*¹
Debtors.

Chapter 7
Case No. 20-01947-jwb
Hon. James W. Boyd
Jointly Administered and
Substantively Consolidated

**ORDER AUTHORIZING EMPLOYMENT OF JAFFE RAITT HEUER & WEISS, P.C.
AS COUNSEL FOR THE CHAPTER 7 TRUSTEE**

This matter having come before the Court upon the *Application for Order Authorizing Employment of Jaffe Raitt Heuer & Weiss, P.C. as Counsel for Chapter 7 Trustee* (the “Application”) filed by Thomas M. Bruinsma, interim Chapter 7 Trustee (the “Trustee”) of the substantively consolidated estate of the above-captioned debtors (collectively, the “Debtors”) seeking entry of an order authorizing and approving the employment of Jaffe Raitt Heuer & Weiss, P.C. (“Jaffe”) as counsel to the Trustee pursuant to sections 327(a) and 328(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); the Court having reviewed the Application; and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that the relief requested in the Application is in the best interests of the Debtors’ estate and its creditors; and the Trustee having

¹ The substantively consolidated Debtors are: Barfly Ventures, LLC (8379), Barfly Management, LLC (6274), 9 Volt, LLC (d/b/a HopCat)(1129), 50 Amp Fuse, LLC (d/b/a Stella’s Lounge)(3684), GRBC Holdings, LLC (d/b/a Grand Rapids Brewing Company)(2130), E L Brewpub, LLC (d/b/a HopCat East Lansing)(5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago, LLC (7552), HopCat-Concessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat-GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat-Indianapolis, LLC (d/b/a HopCat-Broad Ripple)(7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a HopCat,-KC, LLC and Tikicat)(6242), HopCat-Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), HopCat-Royal Oak, LLC (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House, LLC and McFadden’s Restaurant Saloon)(4255).

provided adequate and appropriate notice of the Application under the circumstances; and after due deliberation and good and sufficient cause appearing therefore:

IT IS HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. The Trustee is authorized to employ Jaffe as his counsel in this chapter 7 case, pursuant to section 327(a) and 328(a) of the Bankruptcy Code, for the purposes set forth in the Application and pursuant to the terms set forth in the Application, effective as of May 19, 2021;
3. Jaffe shall apply to the Court for allowance of compensation and reimbursement of expenses in accordance with section 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the local bankruptcy rules, and any orders of this Court;
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry; and
5. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

[END OF ORDER]

Prepared by:
Jaffe Raitt Heuer & Weiss, P.C.
Paul R. Hage (P70460)
27777 Franklin Road, Suite 2500
Southfield, MI 48034
Telephone: (248) 351-3000
phage@jaffelaw.com

IT IS SO ORDERED.

Dated July 12, 2021

4833-7573-8865.v1



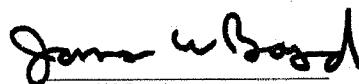

James W. Boyd
United States Bankruptcy Judge

EXHIBIT 3
(Attorney and Paralegal Hourly Rates)

ATTORNEY AND PARALEGAL HOURLY RATES**KIMBERLY ROSS CLAYSON**

Year	Hourly Rate	Hours Billed	Total Amount
2021	N/A	0.00	\$0.00
2022	\$350.00	253.20	\$88,620.00
2023	\$350.00	111.80	\$39,130.00
	\$370.00	23.00	\$8,510.00
TOTAL		388.00	\$136,260.00

PAUL R. HAGE

Year	Hourly Rate	Hours Billed	Total Amount
2021	\$425.00	118.40	\$50,320.00
2022	\$425.00	7.70	\$3,272.50
	\$435.00	18.50	\$8,047.50
2023	\$435.00	22.70	\$9,874.50
	\$520.00 ¹	0.00	\$0.00
TOTAL		180.50	\$71,514.50

MILTON L. KOVINSKY

Year	Hourly Rate	Hours Billed	Total Amount
2021	N/A	0.00	\$0.00
2022	N/A	0.00	\$0.00
2023	\$535.00	2.20	\$1,177.00
TOTAL		2.20	\$1,177.00

ERIC A. LINDEN

Year	Hourly Rate	Hours Billed	Total Amount
2021	N/A	0.00	\$0.00
2022	\$490.00	0.20	\$98.00
2023	N/A	0.00	\$0.00
TOTAL		0.20	\$98.00

¹ From January 1, 2023 to March 31, 2023, the billing rate for Paul R. Hage was \$435.00 an hour. As of April 1, 2023, Paul R. Hage's billing rate increased to \$520.00 an hour.

EMILY M. MAYER

Year	Hourly Rate	Hours Billed	Total Amount
2021	\$320.00	6.50	\$2,080.00
2022	\$340.00	5.10	\$1,734.00
2023	\$340.00	0.60	\$204.00
TOTAL		12.20	\$4,018.00

JUDITH GREENSTONE MILLER

Year	Hourly Rate	Hours Billed	Total Amount
2021	\$500.00	99.20	\$49,600.00
2022	\$500.00	392.00	\$196,100.00
2023	\$500.00	123.40	\$61,700.00
	\$550.00	55.40	\$30,470.00
TOTAL		670.00	\$337,870.00

JULIE A. NORTON

Year	Hourly Rate	Hours Billed	Total Amount
2021	\$240.00	19.10	\$4,584.00
2022	\$240.00	4.90	\$1,176.00
	\$250.00	33.40	\$8,350.00
2023	\$250.00	6.40	\$1,600.00
TOTAL		63.80	\$15,710.00

LAUREN E. SELL

Year	Hourly Rate	Hours Billed	Total Amount
2021	\$230.00	60.20	\$13,846.00
2022	\$230.00	5.90	\$1,357.00
	\$235.00	8.10	\$1,903.50
2023	\$235.00	9.60	\$2,256.00
TOTAL		83.80	\$19,362.50

JAY L. WELFORD

Year	Hourly Rate	Hours Billed	Total Amount
2021	\$510.00	30.80	\$15,708.00
2022	N/A	0.00	\$0.00
2023	N/A	0.00	\$0.00

EXHIBIT 4
(Monthly Fee Statements)

May 2021



Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

Tel: 248.351.3000 / Fax: 248.351.3082

www.taftlaw.com

FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129646

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through May 31, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	6,527.00	.00	6,527.00
CASE	CASE ADMINISTRATION	3,023.00	.00	3,023.00
CLAIMS	CLAIMS ADMINISTRATION	85.00	.00	85.00
DISB	DISBURSEMENTS	.00	196.12	196.12
EMP	EMPLOYMENT	757.50	.00	757.50
Total		10,392.50	196.12	10,588.62

TOTAL THIS INVOICE	\$ 10,588.62
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Client/Matter # TBC7BV/ASSETA

Invoice #: 6129646

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
5/19/21	PRH	Phone call with J. Piggins re extension of deadlines.	.30	127.50
5/21/21	PRH	Correspondence re extension of sellers deadlines (.4). Prepare proposed stipulation and order effectuating extensions (.9).	1.30	552.50
5/24/21	PRH	Correspondence with T. Bruinsma and J. Piggins regarding stipulation extending deadlines (.2). Review proposed revisions from J. Piggins and related correspondence (.4).	.60	255.00
5/25/21	PRH	Attention to stipulation and order extending sellers deadlines.	.40	170.00
5/26/21	JLW	Undertake overview of case regarding causes of action to pursue.	.50	255.00
5/26/21	PRH	Review sellers order extending deadlines and related correspondence with trustee (.1). Review D&O issues (1.3). Related calls and correspondence with J. Miller, M. Cooper and P. Neitzel (1.1).	2.50	1,062.50
5/26/21	JGM	Address and consider D&O insurance policy and tail coverage and potential timing limitations for making claims thereunder (1.0), Address and consider same with Paul Hage (multiple calls) (1.0), Conference call with Paul Hage and Paul Neitzel regarding same (.30), Preparation of notice of intent to assert claim against Zurich Insurance North America (2.0).	4.30	2,150.00
5/27/21	JLW	Review overview of possible claims and causes of action to pursue, checklist of actions.	.20	102.00
5/27/21	PRH	Revise insurer notice letter and discuss related issues with J. Miller (.9). Follow up calls with J. Miller re call with D&O broker (.2). Further edits to insurer notification letter (.2).	1.30	552.50
5/27/21	JGM	Review and respond to emails from Paul Neitzel about scheduling call to address insurance issues (.10), Address notice to insurance company and how to proceed with Paul Hage (.20), Participate in conference call with Paul Neitzel, Jake Schrock and Kevin Zinter about Insurance Coverage under policies (.50), Advise Paul Hage about same and address next steps (.30), Review and revise notice to Zurich Insurance North America (.30), Transmit and review email from Paul Hage about revisions to letter and how to proceed (.20).	1.90	950.00
5/28/21	JGM	Review, revise and finalize letter to Zurich North America (.30), Address transmittal and service of same (.30), Advise Paul Hage of additional changes made to letter (.10).	.70	350.00

TOTAL PROFESSIONAL SERVICES \$ 6,527.00

MATTER TOTAL \$ 6,527.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Jay L. Welford	Partner	.70	510.00	357.00
Paul R. Hage	Partner	6.40	425.00	2,720.00
Judith G. Miller	Partner	6.90	500.00	3,450.00
TOTALS		14.00		\$ 6,527.00

Client/Matter # TBC7BV/CASE

Invoice #: 6129646

RE: CASE ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
5/19/21	PRH	Prepare for and attend initial call with T. Bruinsma (1.8). Follow up call and correspondence with T. Bruinsma (.4).	2.20	935.00
5/22/21	PRH	Consider case strategy.	.30	127.50
5/25/21	JLW	Call with P. Hage to address overall case engagement, extensions being negotiated, call to be set.	.30	153.00
5/25/21	PRH	Correspondence and call with Jaffe team regarding matters to be addressed.	.40	170.00
5/26/21	PRH	Prepare for and attend call with Jaffe team regarding case issues.	1.50	637.50
5/26/21	LES	Conference call with Paul Hage to review case and go over items that need to be addressed in case.	1.00	230.00
5/26/21	JGM	Address background attendant to matter and action to be taken for commencing engagement and representation of the trustee.	1.20	600.00
5/27/21	PRH	Phone call with T. Bruinsma regarding various issues in case.	.40	170.00
TOTAL PROFESSIONAL SERVICES				\$ 3,023.00
MATTER TOTAL				\$ 3,023.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Jay L. Welford	Partner	.30	510.00	153.00
Paul R. Hage	Partner	4.80	425.00	2,040.00
Lauren E. Sell	Paralegal	1.00	230.00	230.00
Judith G. Miller	Partner	1.20	500.00	600.00
TOTALS		7.30		\$ 3,023.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129646

RE: CLAIMS ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
5/19/21	PRH	Correspondence with J. Torf re GFS claims.	.20	85.00
TOTAL PROFESSIONAL SERVICES				\$ 85.00
MATTER TOTAL				\$ 85.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.20	425.00	85.00
TOTALS		.20		\$ 85.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB**Invoice #: 6129646****RE: DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
5/28/21 Copying/printing	11.40
5/28/21 Fax charges	4.50
5/28/21 Tracking number: 1z2vy8841396147411	31.48
5/28/21 Tracking number: 1z2vy8841396761006	43.58
5/28/21 Tracking number: 1z2vy8841396968981	43.58
5/28/21 Tracking number: 1z2vy8841397400199	43.58
5/29/21 Tracking number: 1z2vy8841397400199	18.00
TOTAL COSTS ADVANCED	\$ 196.12
MATTER TOTAL	\$ 196.12

Taft Stettinius & Hollister

Client/Matter # TBC7BV/EMP

Invoice #: 6129646

RE: EMPLOYMENT

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
5/22/21	PRH	Attend to retention issues.	.70	297.50
5/28/21	LES	Draft application for authority to retain and employ Jaffe as counsel for Chapter 11 Bankruptcy.	2.00	460.00

TOTAL PROFESSIONAL SERVICES \$ 757.50

MATTER TOTAL \$ 757.50

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.70	425.00	297.50
Lauren E. Sell	Paralegal	2.00	230.00	460.00
TOTALS		2.70		\$ 757.50

Taft Stettinius & Hollister

Client/Matter # TBC7BV/EMP

Invoice #: 6129646

MONTHLY SUMMARY OF PRIOR INVOICES OUTSTANDING:

INVOICE NUMBER	DATE	INVOICE TOTAL	PAYMENTS RECEIVED	ENDING BALANCE
6129626	9/11/23	16,759.62	.00	16,759.62
6129642	9/11/23	10,714.48	.00	10,714.48

PREVIOUS BALANCE **\$ 27,474.10**

June 2021



Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

Tel: 248.351.3000 / Fax: 248.351.3082

www.taftlaw.com

FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129626

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through June 30, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	11,254.00	.00	11,254.00
CASE	CASE ADMINISTRATION	2,040.00	.00	2,040.00
DISB	DISBURSEMENTS	.00	150.62	150.62
EMP	EMPLOYMENT	3,272.50	.00	3,272.50
PPPFOR	PPP LOAN FORGIVENESS	42.50	.00	42.50
Total		16,609.00	150.62	16,759.62
TOTAL THIS INVOICE				\$ 16,759.62

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129626

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
6/01/21	JLW	Review overview of case regarding next steps in determining documents needed to be identified as part of 2004 motion.	.70	357.00
6/01/21	PRH	Discuss insider causes of action with J. Welford (.8). Correspondence re D&O issues (.2).	1.00	425.00
6/02/21	PRH	Review insurer acknowledgment letter and related correspondence (.2). Correspondence with J. Piggins regarding sellers distribution (.1). Phone call with T. Bruinsma re various litigation matters (.2).	.50	212.50
6/02/21	JGM	Address and review acknowledgment of receipt of claim from Zurich North America.	.20	100.00
6/03/21	JLW	Review Chapter 11 petition of sellers, identify all entities related to sellers re document request, review plan, review tax return, review plan amendment and order confirming plan.	2.60	1,326.00
6/03/21	PRH	Discuss sellers investigation with J. Welford.	.30	127.50
6/07/21	JLW	Review claims in sellers' bankruptcy, review Barfly claim filed, review objection filed to Barfly claim.	1.90	969.00
6/07/21	PRH	Correspondence with J. Welford regarding sellers document review (.8). Follow up correspondence to T. Bruinsma (.1).	.90	382.50
6/07/21	JGM	Review email from Jay Welford about analysis of issues/transfers to sellers and his entities and proposed next steps.	.20	100.00
6/08/21	PRH	Internal correspondence and call to T. Bruinsma regarding litigation investigation.	.20	85.00
6/09/21	JLW	Call with P. Hage re possible claims against other board members, retention of fa to trustee to assist.	.30	153.00
6/09/21	PRH	Address non-dischargeability research (.2). Phone call with J. Welford re litigation theories (.6). Review insurer coverage analysis letter and correspondence with J. Miller and M. Cooper (.3).	1.10	467.50
6/10/21	PRH	Correspondence with M. Cooper and J. Miller re insurance analysis (.1). Review and analyze case law regarding various litigation claims (1.2).	1.30	552.50
6/14/21	JLW	Prepare for and call with trustee, consultants and trustee counsel to plan strategy, outline next steps.	2.40	1,224.00
6/14/21	PRH	Phone call and correspondence with M. Cooper re insurance issues (.5). Attend call with Rock Creek and Trustee regarding background of company and potential litigation claims (1.7). Compile notes from call and related correspondence with J. Welford (.7).	2.90	1,232.50
6/14/21	JGM	Conference call with Mark Cooper and Paul Hage about D&O coverage and letter from Zurich Insurance Company (.40), Review and consider email from Mark Cooper about policy (.20), Transmit various emails and other documents to Mark Cooper to review and consider options (.20), Review notes from Paul Hage about background information about D&O claims (.30).	1.10	550.00
6/15/21	JLW	Emails regarding pulling of corporate minutes and transfer ledgers for analysis of possible causes of action.	.20	102.00
6/17/21	JLW	Email outlining discovery requests needed from sellers and Innovo, based on review of documents and call with former financial advisor to debtors.	1.40	714.00
6/17/21	PRH	Correspondence and address re 2004 motion.	.30	127.50
6/24/21	JLW	Review draft 2004 motion and attachments for sellers and Innovo.	.40	204.00
6/25/21	JLW	Review revised 2004 pleadings for sellers and Innovo, provide changes.	.40	204.00
6/25/21	JLW	Review revised 2004 motion and subpoenas, forward draft to trustee for review prior to submitting to court.	.40	204.00
6/25/21	PRH	Various correspondence re D&O insurance claim.	.30	127.50
6/27/21	JGM	Address email to Lindsay at Zurich Insurance Company.	.20	100.00
6/28/21	JLW	Review changes to 2004 motion, approve same.	.20	102.00

Taft Stettinius & Hollister LLP

Client/Matter # TBC7BV/ASSETA**Invoice #: 6129626**

Date	Atty	Description Of Services Rendered	Hours	Amount
6/28/21	PRH	Correspondence re inquiry from D&O insurer (.1). Review and revise 2004 motion (2.5).	2.60	1,105.00
TOTAL PROFESSIONAL SERVICES				\$ 11,254.00
MATTER TOTAL				\$ 11,254.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Jay L. Welford	Partner	10.90	510.00	5,559.00
Paul R. Hage	Partner	11.40	425.00	4,845.00
Judith G. Miller	Partner	1.70	500.00	850.00
TOTALS		24.00		\$ 11,254.00

Client/Matter # TBC7BV/CASE

Invoice #: 6129626

RE: CASE ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
6/02/21	PRH	Review notice of commencement of case and calendar deadlines.	.10	42.50
6/09/21	PRH	Phone call with T. Bruinsma regarding status of case (.3). Follow up calls and correspondence with P. Neitzel (.8).	1.10	467.50
6/10/21	PRH	Phone call with T. Bruinsma to discuss kickoff call with trustee professionals and follow up correspondence with estate professionals.	.40	170.00
6/11/21	PRH	Phone call with J. Lucas regarding 341 meeting, status of case (.6). Various correspondence regarding transfer of estate funds (.3).	.90	382.50
6/14/21	PRH	Correspondence with UST re estate funds (.2). Phone call with T. Bruinsma regarding various matters (.2).	.40	170.00
6/15/21	PRH	Review sale order and correspondence to debtor professionals re request for documents (.6). Follow up call with P. Neitzel (.3). Correspondence re wire transfer of estate funds (.1). Review amended notice of 341 meeting (.1).	1.10	467.50
6/30/21	PRH	Phone call with T. Bruinsma regarding various issues (.5). Follow up correspondence with estate professionals (.3).	.80	340.00

TOTAL PROFESSIONAL SERVICES \$ 2,040.00

MATTER TOTAL \$ 2,040.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	4.80	425.00	2,040.00
TOTALS		4.80		\$ 2,040.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129626

RE: DISBURSEMENTS

COSTS ADVANCED

Description	Amount
6/01/21 Tracking number: 1z2vy8841396147411	18.00
6/09/21 Westlaw charges	31.02
6/23/21 Pacer charges net charges	101.60
TOTAL COSTS ADVANCED	\$ 150.62
MATTER TOTAL	\$ 150.62

Client/Matter # TBC7BV/EMP

Invoice #: 6129626

RE: EMPLOYMENT

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
6/01/21	PRH	Phone call and correspondence with L. Sell re retention application and declaration.	.30	127.50
6/02/21	PRH	Correspondence with L. Sell re draft employment application, declaration and order (.2). Review and revise same (2.1).	2.30	977.50
6/03/21	PRH	Attention to retention application and related documents (1.5). Correspondence and call with T. Bruinsma re same (.4). Finalize same for filing (.5). Correspondence to UST re same (.1).	2.50	1,062.50
6/15/21	PRH	Attend to Rock Creek retention application.	.70	297.50
6/18/21	PRH	Attend to Rock Creek retention application (1.0). Related correspondence with P. Neitzel (.1).	1.10	467.50
6/21/21	PRH	Correspondence with P. Neitzel and T. Bruinsma re Rock Creek retention application.	.10	42.50
6/23/21	PRH	Correspondence with T. Bruinsma re Rock Creek retention application (.1). Finalize and file same (.5). Correspondence to UST re application (.1).	.70	297.50
TOTAL PROFESSIONAL SERVICES				\$ 3,272.50
MATTER TOTAL				\$ 3,272.50

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	7.70	425.00	3,272.50
TOTALS		7.70		\$ 3,272.50



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FEIN#: 31-0541755

RE: PPP LOAN FORGIVENESS

PROFESSIONAL SERVICES RENDERED

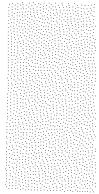
Date	Atty	Description Of Services Rendered	Hours	Amount
6/02/21	PRH	Correspondence with P. Neitzel re PPP Forgiveness application follow-up.	.10	42.50
TOTAL PROFESSIONAL SERVICES				\$ 42.50
MATTER TOTAL				\$ 42.50

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.10	425.00	42.50
TOTALS		.10		\$ 42.50

July 2021





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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129642

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through July 31, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	8,467.50	.00	8,467.50
CASE	CASE ADMINISTRATION	1,321.00	.00	1,321.00
CLAIMS	CLAIMS ADMINISTRATION	42.50	.00	42.50
DISB	DISBURSEMENTS	.00	288.48	288.48
EMP	EMPLOYMENT	595.00	.00	595.00
Total		10,426.00	288.48	10,714.48

TOTAL THIS INVOICE	\$ 10,714.48
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Client/Matter # TBC7BV/ASSETA

Invoice #: 6129642

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
7/01/21	JLW	Review and forward to sellers' counsel the 2004 motion to be filed.	.20	102.00
7/01/21	PRH	Review revised 2004 motion (.30). Related correspondence (.1).	.40	170.00
7/06/21	PRH	Review filed 2004 motion (.2). Related correspondence with Jaffe team and trustee (.2). Correspondence re analysis of Insurance Coverage (.2).	.60	255.00
7/07/21	PRH	Review message from D. Malek and related correspondence with J. Welford.	.10	42.50
7/07/21	JGM	Review and address emails from Mark Cooper and Paul Hage about insurance issues.	.20	100.00
7/08/21	JLW	Call with counsel for Innovo regarding 2004 and his request to limit its scope.	.60	306.00
7/08/21	JLW	Email to trustee regarding call with Innovo counsel and request of counsel to limit scope of exam.	.20	102.00
7/08/21	PRH	Phone all with M. Brandess re potential claims (.7). Review sellers plan reporting documents (.2).	.90	382.50
7/09/21	PRH	Follow up call with M. Brandess re causes of action (.4). Correspondence with Jaffe team re sellers financial statements (.3).	.70	297.50
7/12/21	PRH	Correspondence re document production from P. Neitzel (.1). Review correspondence re fraudulent transfer issues (.1).	.20	85.00
7/13/21	JLW	Review research on ability to avoid transfers of assets subject to an existing lien.	.10	51.00
7/13/21	PRH	Review meeting minutes received from P. Neitzel (.3). Correspondence with J. Lucas (.1). Follow up call with P. Neitzel (.3). Discuss document review with H. Kimball (.2).	.90	382.50
7/19/21	PRH	Discuss sellers strategy with J. Welford (.2). Review sellers objection to 2004 motion and related correspondence with J. Welford (.2).	.40	170.00
7/20/21	JLW	Review documents produced by Innovo in response to 2004 request.	.80	408.00
7/21/21	JLW	Determine next steps regarding Innovo based on only partial disclosures provided regarding 2004 request.	.20	102.00
7/21/21	JLW	Review objection to motion for 2004 exam filed by sellers.	.20	102.00
7/21/21	JLW	Determine strategy in light of response to 2004 motion by sellers and Innovo, next steps, possible combined 2004.	.80	408.00
7/21/21	PRH	Consider 2004 related issues with J. Welford (.6). Review correspondence re Innovo arguments (.4). Phone call to J. Piggins (.5). Conference with J. Welford re sellers issues (.8). Attend to research re potential causes of action and related correspondence with trustee (1.7).	4.00	1,700.00
7/22/21	PRH	Correspondence with P. Neitzel re insider transfers (.1).	.10	42.50
7/22/21	LES	Review documents uploaded by Paul Neitzel.	.20	46.00
7/26/21	PRH	Attention to motion to extend deadlines.	2.90	1,232.50
7/27/21	JLW	Review emails re summary of case law re Barfly transfers to seller's wife.	.20	102.00
7/27/21	JLW	Review draft motion to extend date to bring non-dischargeability action, respond to claim objection.	.40	204.00
7/28/21	JLW	Email to trustee F.A. Regarding Innovo produced documents and F.A. Opinion re same.	.20	102.00
7/28/21	PRH	Attention to edits to sellers extension motion (1.2). Related correspondence with T. Bruinsma (.2).	1.40	595.00
7/29/21	PRH	Review produced documents (.9). Address document production issues with J. Lucas and P. Neitzel (.9). Attention to motion to extend deadlines (.2).	2.00	850.00
7/30/21	PRH	Review notice of hearing re sellers motion to extend deadlines (.2).	.20	85.00
7/31/21	PRH	Correspondence re responses to 2004 motion.	.10	42.50

TOTAL PROFESSIONAL SERVICES

\$ 8,467.50

Taft Stettinius & Hollister LLP

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129642

MATTER TOTAL**\$ 8,467.50****SUMMARY OF PROFESSIONAL SERVICES****SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Jay L. Welford	Partner	3.90	510.00	1,989.00
Paul R. Hage	Partner	14.90	425.00	6,332.50
Lauren E. Sell	Paralegal	.20	230.00	46.00
Judith G. Miller	Partner	.20	500.00	100.00
TOTALS		19.20		\$ 8,467.50

Client/Matter # TBC7BV/CASE

Invoice #: 6129642

RE: CASE ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
7/06/21	PRH	Phone calls and correspondence with T. Bruinsma and J. Lucas re 341 examination and request for documents from debtors (.9). Attend 341 meeting of creditors (.6). Follow up calls and correspondence with T. Bruinsma and J. Lucas (.4).	1.90	807.50
7/09/21	PRH	Correspondence re funds received from Pachulski.	.30	127.50
7/09/21	LES	Letter to Thomas Bruinsma with trustee check.	.20	46.00
7/27/21	PRH	Correspondence with J. Lucas regarding provision of documents.	.10	42.50
7/29/21	PRH	Phone call to T. Bruinsma re status of case.	.70	297.50
TOTAL PROFESSIONAL SERVICES				\$ 1,321.00
MATTER TOTAL				\$ 1,321.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	3.00	425.00	1,275.00
Lauren E. Sell	Paralegal	.20	230.00	46.00
TOTALS		3.20		\$ 1,321.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/CLAIMS**Invoice #: 6129642****RE: CLAIMS ADMINISTRATION****PROFESSIONAL SERVICES RENDERED**

Date	Atty	Description Of Services Rendered	Hours	Amount
7/29/21	PRH	Correspondence with T. Bruinsma and N. Lidvall re State of Michigan claim.	.10	42.50
TOTAL PROFESSIONAL SERVICES				\$ 42.50
MATTER TOTAL				\$ 42.50

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.10	425.00	42.50
TOTALS		.10		\$ 42.50

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129642

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
7/06/21 Federal express airbill: 774182299884	20.02
7/09/21 Copying/printing	5.70
7/21/21 Westlaw charges	242.56
7/30/21 Telephone charges cc	20.20
TOTAL COSTS ADVANCED	\$ 288.48
MATTER TOTAL	\$ 288.48

Client/Matter # TBC7BV/EMP

Invoice #: 6129642

RE: EMPLOYMENT

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
7/07/21	PRH	Prepare and file CNR regarding Jaffe retention application.	.60	255.00
7/12/21	PRH	Review order approving Jaffe retention.	.10	42.50
7/28/21	PRH	Attend to Certificate of No Objection re Rock Creek retention application.	.60	255.00
7/30/21	PRH	Respond to inquiry from court regarding Rock Creek retention order.	.10	42.50
TOTAL PROFESSIONAL SERVICES				\$ 595.00
MATTER TOTAL				\$ 595.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	1.40	425.00	595.00
TOTALS		1.40		\$ 595.00

August 2021



Taft Stettinius & Hollister LLP
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 Tel: 248.351.3000 / Fax: 248.351.3082
www.taftlaw.com
 FEIN#: 31-0541755

September 11, 2023
 Invoice #: 6129669

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through August 31, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	16,935.00	.00	16,935.00
CASE	CASE ADMINISTRATION	425.00	.00	425.00
DISB	DISBURSEMENTS	.00	803.93	803.93
EMP	EMPLOYMENT	42.50	.00	42.50
Total		17,402.50	803.93	18,206.43
TOTAL THIS INVOICE				\$ 18,206.43

Client/Matter # TBC7BV/CASE

Invoice #: 6129669

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/02/21	JLW	Emails regarding Innovo pushback on further document production, extension to respond to motion for 2004 documents and exam.	.20	102.00
8/02/21	PRH	Correspondence with H. Kimball and T. Neddermyer re service of motion to extend (.2).	.10	42.50
8/03/21	JLW	Review email from counsel for Innovo re request to limit document request, review document request to limit list.	.20	102.00
8/03/21	PRH	Correspondence with J. Welford re 2004 motion issues. Review Innovo correspondence.	.40	170.00
8/04/21	JLW	Call with Innovo counsel regarding 2004 motion, negotiate narrowing of document request, explain basis for trustee right to 2004 exam.	.30	153.00
8/04/21	JLW	Review 2004 request to Innovo to narrow scope in light of documents made available to trustee from purchaser.	.40	170.00
8/04/21	JLW	Analysis of options in preparation for hearing on motion for 2004 of sellers, based on inability to reach resolution on same with sellers' counsel.	.80	408.00
8/04/21	PRH	Correspondence re D&O insurance issues (.4). Correspondence with J. Welford re proposed resolution of Innovo issues (.4). Phone call with J. Piggins regarding 2004 issues (.3). Phone call with J. Welford to discuss litigation strategy (.8).	1.90	807.50
8/04/21	JGM	Address and respond to emails from Mark Cooper about insurance issues and transmit insurance documents to him.	.30	150.00
8/05/21	JLW	Review research regarding reply brief to be filed to sellers opposition to 2004 motion.	.80	408.00
8/05/21	PRH	Phone call and correspondence to P. Neitzel regarding list of transfers (.2).	.20	85.00
8/06/21	PRH	Review 2004 exam research.	.50	212.50
8/09/21	JLW	Review summary of expenditures by debtors provided by financial advisor regarding possible recoveries to be pursued.	.30	153.00
8/09/21	JLW	Emails regarding outline of reply brief regarding motion for 2004 exam of sellers.	.20	102.00
8/09/21	JLW	Review additional research regarding reply to be filed to sellers objection to trustee's 2004 motion.	.20	102.00
8/09/21	JLW	Review sellers' response to motion to extend date to commence 523 action and respond to claim objection.	.20	102.00
8/09/21	JLW	Determine next steps re 2004 battle with sellers.	.50	255.00
8/09/21	PRH	Review sellers' response to motion to extend (.2). Review research re 2004 issues (1.2). Phone call with J. Welford regarding strategy (.6). E-mail correspondence to J. Piggins re objection (.2).	2.20	935.00
8/10/21	PRH	Review lists of Barfly transfers and discuss same with P. Neitzel (1.0). Attend to reply re motion to extend deadlines (1.6).	2.60	1,105.00
8/12/21	JLW	Review and comment on draft reply to sellers' response to trustee motion for 2004 motion.	.40	204.00
8/12/21	JLW	Review draft reply to sellers' response to trustee motion to extend 523 deadline and deadline to respond to claim objection.	.20	102.00
8/12/21	PRH	Finalize reply brief re motion to extend deadlines (.5). Attend to reply brief re 2004 motion (2.7).	3.20	1,360.00
8/13/21	PRH	Attend to final edits to briefs and related correspondence with T. Bruinsma (.6). Review and revise supplemental 2004 motion in sellers case (.5).	1.10	467.50
8/16/21	JLW	Review emails re sellers' new position on 2004 motion and defenses to same.	.20	102.00
8/16/21	JLW	Internal call to address new position of sellers, reply briefs to be filed, next steps re resolution.	.20	102.00
8/16/21	JLW	Call with sellers counsel to work out open issues on 2004 motion and motion to extend date to file 523.	.20	102.00

Client/Matter # TBC7BV/CASE

Invoice #: 6129669

Date	Atty	Description Of Services Rendered	Hours	Amount
8/16/21	JLW	Email to trustee regarding proposed settlement of sellers 2004 motion and motion to extend date to file 523 action.	.20	102.00
8/16/21	JLW	Analysis of offer received from sellers regarding 2004 motion and possible resolution of same.	.30	153.00
8/16/21	PRH	Review correspondence from J. Piggins regarding 2004 motion and related correspondence with J. Welford (1.0). Review Innovo correspondence (.1). Phone call from m. Maggio regarding status of case (.2).	1.30	552.50
8/17/21	JLW	Call with financial advisor regarding analysis of Innovo leases.	.30	153.00
8/17/21	JLW	Call with counsel for sellers to resolve pending motions on 523 date and 2004 issues.	.20	102.00
8/17/21	JLW	Draft proposed order resolving motion to extend 523 deadline.	.80	408.00
8/17/21	JLW	Draft order resolving 2004 motion.	.80	408.00
8/17/21	JLW	Prepare for hearing on motion for 2004 exam.	.70	357.00
8/17/21	JLW	Revise proposed order granting extension to objection to discharge under 523.	.40	204.00
8/17/21	JLW	Revise order granting 2004 motion and forward to sellers' counsel for review.	.70	357.00
8/17/21	PRH	Review proposed stipulated orders re 2004 motion and related correspondence and call with J. Welford.	1.10	467.50
8/18/21	JLW	Multiple emails re negotiation of order re motion to extend 523 filing deadline, review order drafts, finalize.	.90	459.00
8/18/21	JLW	Multiple emails regarding negotiation of 2004 order with Innovo and sellers' counsel, review drafts of same, approve final form for uploading.	1.80	918.00
8/18/21	PRH	Various correspondence re 2004 orders with J. Welford and J. Piggins (1.1).	1.10	467.50
8/19/21	JLW	Prepare for and participate in hearing on trustee motion to extend 523 deadline and claim objection response deadline.	.80	408.00
8/19/21	JLW	Prepare for and participate in hearing on motion for 2004 exam of Innovo and Mark Sellers.	.80	408.00
8/19/21	PRH	Correspondence with J. Welford re 2004 hearing (.1). Review entered orders (.3). Correspondence re Innovo document requests (.4).	.80	340.00
8/23/21	EMM	Insurance Coverage analysis.	3.40	1,088.00
8/24/21	EMM	Insurance Coverage analysis.	1.20	384.00
8/30/21	EMM	Prepare memo re Insurance coverage analysis.	1.30	416.00
8/30/21	PRH	Phone call with J. Piggins re discovery issue (.3). Internal correspondence re discovery/litigation strategy (.2). Correspondence re insurance policy review (.1).	.60	255.00
8/31/21	EMM	Finalize memo re Insurance coverage analysis.	.60	192.00
8/31/21	PRH	Review memorandum re D&O Insurance Coverage and related correspondence.	.70	297.50

TOTAL PROFESSIONAL SERVICES \$ 16,935.00

MATTER TOTAL \$ 16,935.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Emily M. Mayer	Partner	6.50	320.00	2,080.00
Jay L. Welford	Partner	14.00	510.00	7,140.00
Paul R. Hage	Partner	17.80	425.00	7,565.00
Judith G. Miller	Partner	.30	500.00	150.00
TOTALS		38.60		\$ 16,935.00

Client/Matter # TBC7BV/CASE

Invoice #: 6129669

RE: CASE ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/03/21	PRH	Attend continued 341 meeting of creditors.	.40	170.00
8/26/21	PRH	Correspondence and call with E. Voneitzen regarding tax return issue (.3). Research regarding same and correspondence to T. Bruinsma (.3).	.60	255.00
TOTAL PROFESSIONAL SERVICES				\$ 425.00
MATTER TOTAL				\$ 425.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	1.00	425.00	425.00
TOTALS		1.00		\$ 425.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129669

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
8/02/21 Postage expense	1.62
8/09/21 Copying/printing	1.20
8/12/21 Pacer charges net charges	70.00
8/24/21 Westlaw charges	702.80
8/27/21 Telephone charges cc	28.31
TOTAL COSTS ADVANCED	\$ 803.93
MATTER TOTAL	\$ 803.93

Taft Stettinius & Hollister

Client/Matter # TBC7BV/EMP

Invoice #: 6129669

RE: EMPLOYMENT

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/04/21	PRH	Review order approving Rock Creek retention and related correspondence with P. Neitzel.	.10	42.50
TOTAL PROFESSIONAL SERVICES				\$ 42.50
MATTER TOTAL				\$ 42.50

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.10	425.00	42.50
TOTALS		.10		\$ 42.50

September 2021





Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023
 Invoice #: 6129699

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through September 30, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	15,735.00	.00	15,735.00
CASE	CASE ADMINISTRATION	552.50	.00	552.50
PPPFOR	PPP LOAN FORGIVENESS	595.00	.00	595.00
Total		16,882.50	.00	16,882.50

TOTAL THIS INVOICE \$ 16,882.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129699

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
9/01/21	JLW	Call to address Barfly strategy.	1.00	510.00
9/01/21	PRH	Revise D&O memo and send same to T. Bruinsma (.4). Phone call and correspondence with P. Neitzel re status of obtaining documents (.2). Discuss litigation strategy with Jaffe team (1.0).	1.60	680.00
9/01/21	JGM	Conference call with Jaffe team to address status of investigation, production of documents, identification of additional information needed and next steps (1.0), Address memorandum about Insurance Coverage (.50), Address same with Paul Hage (.30).	1.80	900.00
9/02/21	JGM	Review memo on review of board minutes (.50), Email to Paul Hage about same (.30).	.80	400.00
9/03/21	PRH	Review documents from P. Neitzel (.3). Conference call with J. Welford and P. Neitzel regarding discovery issues (1.1). Follow up correspondence to P. Neitzel re requested documents (.3).	1.70	722.50
9/03/21	JGM	Review and respond to emails from Paul Hage about production and review of documents and background facts attendant thereto.	.30	150.00
9/07/21	PRH	Attention to various discovery related issues (.6). Phone call and correspondence with J. Piggins re production of text messages (.2).	.80	340.00
9/08/21	PRH	Review financial statements provided by P. Neitzel (.5). Attention to document J. Miller (.3.5).	.80	340.00
9/08/21	JAN	Telephone calls and emails with Lauren Sell and Paul Hage regarding setting up relativity workspace and assist in preparing the project initiation form for relativity.	.50	120.00
9/08/21	JGM	Address production and review of documents with Paul Hage.	.30	150.00
9/09/21	JAN	Revise project initiation form for relativity and emails to KLD regarding same.	.30	72.00
9/14/21	PRH	Phone calls and correspondence with T. Bruinsma and J. Piggins re text message issue.	.60	255.00
9/17/21	PRH	Review response to discovery from J. Piggins and related correspondence.	.20	85.00
9/17/21	JGM	Review email from Paul Hage about response to 2004 request for documents (.20), Address next steps with Paul Hage (.20).	.40	200.00
9/19/21	JGM	Review documents provided by Paul Neizel (1.5), Review response of mark seller's to trustee's request for production of documents (.30).	1.80	900.00
9/20/21	JGM	Address document production and action to be taken with Paul Hage.	.30	150.00
9/22/21	PRH	Correspondence regarding document review.	.30	127.50
9/22/21	JAN	Download sellers' email file, analyze and organize contents of r drive, problem solve extraction of pdf portfolio and multiple emails with Hailey Kimball and KLDDiscovery regarding processing files and promoting to relativity.	2.50	600.00
9/23/21	PRH	Correspondence re seller's claims and document review (.3). Follow up call J. Miller (.8).	1.10	467.50
9/23/21	JAN	Emails with KLD regarding processing Mark Sellers emails and pdf portfolio, review processing report.	.40	96.00
9/23/21	JGM	Follow up call with Paul Hage to address status, strategy and next steps (.50), Email to Paul Neitzel and Jim Gansman to confirm call and address deliverables (.30), Review emails about discovery issues (.30), Address scheduling call to address discovery issues (.10).	.90	450.00
9/24/21	PRH	Correspondence re 341 exams, documents.	.20	85.00
9/24/21	JAN	Address Mark Sellers' massive PST files with Abel Balderas; review files in relativity and emails with KLD regarding reorganizing folder structure.	.70	168.00
9/24/21	JGM	Address document production.	.50	250.00
9/27/21	PRH	Correspondence re document production and review.	.50	212.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129699

Date	Atty	Description Of Services Rendered	Hours	Amount
9/27/21	JAN	Attempts to download documents produced by sellers, analyze production and Address processing options and emails to Abel Balderas regarding providing KLD with access to his share file to download sellers PST files.	.70	168.00
9/27/21	JGM	Review documents produced by Mark Sellers (1.50), Follow up email to Paul Neitzel and Jim Gansman about status of deliverables (.20), Email from Jim Gansman about same (.10).	1.80	900.00
9/28/21	PRH	Correspondence regarding document production issues (.2). Phone call with J. Miller re same (.2).	.40	170.00
9/28/21	JAN	Address organization of file in relativity, search terms and status of collection.	.80	192.00
9/28/21	JAN	Organize various downloaded documents from Barfly and produced my Mark Sellers and prepare for loading to relativity.	1.40	336.00
9/28/21	JAN	Multiple communications Ediscovery vendor regarding loading documents to relativity and organization of same.	.60	144.00
9/28/21	JAN	Review and analyze metadata report received from attorney Piggins and emails with KLD regarding ability to process the single document pdf and overlay the metadata field.	.40	96.00
9/28/21	JGM	Address establishing search terms for discovery, status of download of documents produced and how to address (.60), Review of documents produced by Mark Sellers (3.5).	4.10	2,050.00
9/29/21	PRH	Review correspondence re call with s. Cooley (.1). Correspondence re document issues with J. Miller (.1).	.20	85.00
9/29/21	JAN	Multiple communications with KLD and client contact regarding processing sellers PST files and third party productions as well as setting up coding panel, permissions, search terms and capabilities.	1.20	288.00
9/29/21	JAN	Transfer third-party production to KLD for processing, organize documents on the shared drive and in relativity.	1.40	336.00
9/29/21	JGM	Review and respond to email from Jim Gansman about scheduling call with Scott Cooley and production of deliverables (.40), Address emails from Julie Norton about discovery terms (.20), Review 2004 motion and order (.30), Email to Paul to address same (.10).	1.00	500.00
9/30/21	PRH	Review correspondence re sellers document production issues.	.20	85.00
9/30/21	JAN	Address search terms and case organization in relativity.	.70	168.00
9/30/21	JAN	Search and review emails to locate emails addresses and other key terms to search.	1.40	336.00
9/30/21	JGM	Review order extending the date for the trustee to file a discharge complaint against Mark Sellers (.10), follow-up email to Jim Gansman about scheduling meeting with Scott Cooley (.10) Continue review of documents produced by sellers (2.5), Address emails from Julie Norton about discovery search terms and time parameters (.20).	2.90	1,450.00
TOTAL PROFESSIONAL SERVICES				\$ 15,735.00
MATTER TOTAL				\$ 15,735.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129699

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Jay L. Welford	Partner	1.00	510.00	510.00
Paul R. Hage	Partner	8.60	425.00	3,655.00
Julie A. Norton	Paralegal	13.00	240.00	3,120.00
Judith G. Miller	Partner	16.90	500.00	8,450.00
TOTALS		39.50		\$ 15,735.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/CASE

Invoice #: 6129699

RE: CASE ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
9/01/21	PRH	Phone call with T. Bruinsma regarding various issues in case (.8). Phone call with E. Voneitzen re tax issue (.4).	1.20	510.00
9/02/21	PRH	Correspondence re tax return issue with E. Voneitzen.	.10	42.50
TOTAL PROFESSIONAL SERVICES				\$ 552.50
MATTER TOTAL				\$ 552.50

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	1.30	425.00	552.50
TOTALS		1.30		\$ 552.50

Client/Matter # TBC7BV/PPPFOR

Invoice #: 6129699

RE: PPP LOAN FORGIVENESS

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
9/03/21	PRH	Discuss status of PPP Loan Forgiveness application with P. Neitzel.	.20	85.00
9/07/21	PRH	Review correspondence from P. Neitzel re PPP Forgiveness (.3). Follow up correspondence to T. Bruinsma (.1).	.40	170.00
9/08/21	PRH	Phone call with T. Bruinsma and P. Neitzel regarding PPP Forgiveness application and tax issues (.3). Follow up correspondence to E. Voneitzen (.1).	.40	170.00
9/10/21	PRH	Correspondence with P. Neitzel re PPP Loan Forgiveness status.	.10	42.50
9/13/21	PRH	Correspondence re filing of PPP Forgiveness application.	.10	42.50
9/14/21	PRH	Correspondence re PPP Forgiveness application.	.10	42.50
9/22/21	PRH	Review correspondence re status of PPP Forgiveness application.	.10	42.50
TOTAL PROFESSIONAL SERVICES				\$ 595.00
MATTER TOTAL				\$ 595.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	1.40	425.00	595.00
TOTALS		1.40		\$ 595.00

October 2021



Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

Tel: 248.351.3000 / Fax: 248.351.3082

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129723

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through October 31, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	35,851.00	.00	35,851.00
DISB	DISBURSEMENTS	.00	4,454.02	4,454.02
Total		35,851.00	4,454.02	40,305.02
TOTAL THIS INVOICE				\$ 40,305.02

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129723

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
10/01/21	JAN	Review and analyze search term hit report for sellers' email files.	.40	96.00
10/01/21	JGM	Prepare for and participate in conference call with Paul Neitzel, Jim Gansman, and Scott Cooley (1.2), Address and consider timing for search of emails.	1.40	700.00
10/04/21	PRH	Discuss status of document review, investigation with J. Miller.	.20	85.00
10/04/21	JAN	Review and address sellers email search processing report and emails.	.50	120.00
10/04/21	JGM	Review email from Paul Neitzel about documents (.10), Address status with Paul Hage (.10).	.20	100.00
10/05/21	JAN	Address search term promotion, refining search terms, coding and processing sellers Barfly emails into relativity.	.90	216.00
10/05/21	JAN	Review search results, run searches for calendar entries and non-substantive emails and code them out of the review set.	1.50	360.00
10/05/21	JGM	Address next steps on discovery and seeking extension to file discharge action (.40), Follow up conversation about same with Julie Norton (.20), Review and consider responses from John Piggens (.20).	.80	400.00
10/06/21	PRH	Correspondence re sellers document production and stipulation to extend deadlines.	.30	127.50
10/06/21	JAN	Telephone call with Judy Miller regarding navigating and coding emails in relativity.	.20	48.00
10/06/21	LES	Review dockets for notice of appearance for Judy Miller. Draft notice of appearance in case 20-02619-jwb.	.40	92.00
10/06/21	JGM	Review emails from John Piggens regarding extending date for filing discharge complaint (.20), and Review and respond to email from Paul Hage about same (.10), Continue reviewing emails produced by Mark Sellers (2.5), Address stipulation and order to extend various dates (.50), Review and revise stipulation and order to extend dates (.30) Address filing of appearance (.10), Review email to John Piggens about same (.10).	3.80	1,900.00
10/07/21	JGM	Review of documents produced by Mark Sellers (2.0).	2.00	1,000.00
10/08/21	LES	Review discovery documents for claims against Innovo and Mark Sellers.	3.00	690.00
10/11/21	PRH	Address and consider document review/2004 strategy (.9). Correspondence re seller's stipulation (.1).	1.00	425.00
10/11/21	LES	Review discovery documents in relativity.	2.00	460.00
10/11/21	JGM	Address status of review of documents and how to proceed (.20), address discovery and next steps (.50), Review and consider email between Mark Sellers and Mastodon about turning around Hopcat (.20), Email from John Piggens agreeing to extensions (.10).	1.00	500.00
10/12/21	LES	Review discovery documents in relativity.	1.00	230.00
10/12/21	JGM	Address accessing company email boxes (.50), Review documents/emails produced by Mark Sellers (1.5).	2.00	1,000.00
10/13/21	PRH	Review order extending deadlines. Review correspondence re e-discovery issues.	.20	85.00
10/13/21	LES	Review discovery documents in relativity.	5.00	1,150.00
10/13/21	JGM	Address production of email boxes and emails in connection therewith (.40), Address status of getting 341 transcript with Michael Maggio (.10), Continue to review emails produced by Mark Sellers (4.0).	4.00	2,000.00
10/14/21	JGM	Review emails produced by Mark Sellers.	.80	400.00
10/15/21	LES	Review discovery documents in relativity.	4.00	920.00
10/15/21	JGM	Review emails from Abel and Colin about download of email boxes and time period for discovery review.	.20	100.00
10/18/21	PRH	Address M. Sellers production.	.40	170.00
10/18/21	LES	Review discovery documents in relativity.	5.50	1,265.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129723

Date	Atty	Description Of Services Rendered	Hours	Amount
10/19/21	PRH	Address sellers text message issue with T. Bruinsma (.7). Follow up call with J. Miller about same (.5). Discuss general litigation strategy with T. Bruinsma (.4). Related correspondence (.6). Correspondence re e-discovery issues (.4).	2.60	1,105.00
10/19/21	JAN	Address collection of linked documents and access to o365 modern attachments tool.	.80	192.00
10/19/21	LES	Review discovery documents in relativity.	4.00	920.00
10/19/21	LES	Address discovery on relativity.	.50	115.00
10/19/21	JGM	Address discovery and strategy issues and how to proceed (.80), Review email from Paul Hage to John Piggens about discovery issues (.10), address download of email boxes (.30).	1.20	600.00
10/20/21	PRH	Correspondence with J. Piggens regarding text message issue (.3). Discuss litigation strategy with J. Miller (.7). Meet and confer call with J. Miller and J. Piggens (.5). Follow up correspondence with J. Piggens (.3).	1.80	765.00
10/20/21	JGM	Address emails about download of mail box emails from company representatives (multiple emails) (.30), Address email from John Piggens about meet and confer discovery issues and scheduling call to address same (.20), Address and respond to emails from Sarah at UST's office about 341 transcript (multiple emails) (.30), Address preparation for call with John Piggens with Paul Hage (.30), Review and address email from John Piggens about production of text messages with Paul Hage (.20), Conference call with John Piggens and Paul Hage about discovery issues and options on how to proceed (.50), Follow up call with Paul Hage about next steps (.20), Review emails produced by Mark Sellers (1.0).	3.00	1,500.00
10/21/21	PRH	Attention to discovery dispute and settlement offer to M. Sellers.	2.30	977.50
10/21/21	LES	Review discovery documents in relativity.	5.00	1,150.00
10/21/21	JGM	Preparation of proposed email to John Piggens about proposed waiver of sellers' claim in exchange for trustee's waiver of non-dischargeability claim (2.3), Address same with Paul Hage (.20).	2.50	1,250.00
10/22/21	PRH	Phone call with T. Bruinsma and J. Miller re settlement strategy (.4). E-mail correspondence with J. Piggens (.4).	.80	340.00
10/22/21	JGM	Participate in call with Paul Hage and Tom Bruinsma about status of case, outstanding discovery and proposed settlement.	.50	250.00
10/23/21	JGM	Address email with transmittal of emails.	.20	100.00
10/25/21	PRH	Review settlement offer from J. Piggens and discuss same with J. Miller (.7). Follow up correspondence (.1). Correspondence re document production (.2). Address and consider litigation strategy (.6).	1.60	680.00
10/25/21	JAN	Download, extract, review and analyze production of text messages from sellers.	1.80	432.00
10/25/21	LES	Review discovery documents in relativity.	6.00	1,380.00
10/25/21	JGM	Review and consider email response to settlement offer and counteroffer from John Piggens (.30), Address and consider same with Paul Hage (.30), Review sellers' employment agreement (.30), Research regarding equitable subordination and bases to object to sellers' claim (1.0), Address production of supplemental discovery and downloading same with Julie Norton (multiple emails) (.30), Review emails produced by sellers (2.6).	4.80	2,400.00
10/26/21	LES	Review discovery documents in relativity.	3.00	690.00
10/26/21	JGM	Address receipt of CD for 341 exam from UST's office (.10), Transmit sellers' claim to Paul Neitzel to review (.30), Analyze and consider employment agreement and amended claim of sellers (1.0).	1.40	700.00
10/27/21	PRH	Discuss sellers claim issues with J. Miller.	.40	170.00
10/27/21	LES	Review discovery documents in relativity.	4.00	920.00
10/27/21	JGM	Review emails about unlocking email boxes for discovery purposes (.20), Address sellers employment contract with Paul Hage (.20).	.40	200.00
10/28/21	PRH	Correspondence with J. Miller re potential sellers claim objection.	.30	127.50
10/28/21	LES	Review discovery documents in relativity.	6.00	1,380.00
10/28/21	JGM	Preparation of email to Paul Neitzel about sellers' employment agreement and issues to discuss (1.0), Address email with Paul Hage (.10), Review and respond to email from Paul Neitzel about scheduling a call to address sellers' claim (.20).	1.30	650.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129723

Date	Atty	Description Of Services Rendered	Hours	Amount
10/29/21	PRH	Discuss e-discovery issues with H. Kimball (.3). Phone call with J. Miller re sellers claim issue (.4).	.70	297.50
10/29/21	LES	Review discovery documents in relativity.	4.00	920.00
10/29/21	JGM	Address sellers' claim with Paul Neitzel and Jim Gansman (.70), Follow up call with Paul Hage about same and next steps (.30), Email to John Lucas about sellers' termination from employment (.20), Review emails produced by Mark Sellers (.80).	2.00	1,000.00

TOTAL PROFESSIONAL SERVICES	\$ 35,851.00
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MATTER TOTAL	\$ 35,851.00
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SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	12.60	425.00	5,355.00
Julie A. Norton	Paralegal	6.10	240.00	1,464.00
Lauren E. Sell	Paralegal	53.40	230.00	12,282.00
Judith G. Miller	Partner	33.50	500.00	16,750.00
TOTALS		105.60		\$ 35,851.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129723

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
10/26/21 File transfer	20.00
10/26/21 Tracking number: 1z2vy8840190725365	41.17
10/27/21 E-discovery - storage	19.50
10/27/21 E-discovery - services	1,227.50
10/31/21 E-discovery - storage	1,412.10
10/31/21 E-discovery - services	1,733.75
TOTAL COSTS ADVANCED	\$ 4,454.02
MATTER TOTAL	\$ 4,454.02

November 2021



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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129726

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through November 30, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	21,963.00	.00	21,963.00
DISB	DISBURSEMENTS	.00	167.53	167.53
Total		21,963.00	167.53	22,130.53
TOTAL THIS INVOICE				\$ 22,130.53

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129726

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
11/01/21	PRH	Address and consider document review/e-discovery issues (.1.3). Phone call with J. Piggins re settlement discussions (.4). Follow up call with T. Bruinsma re strategy (.6).	2.30	977.50
11/01/21	LES	Review Barfly documents in relativity.	1.00	230.00
11/01/21	JGM	Address sellers' claim under employment agreement and underlying facts associated with termination with John Lucas (.30), Review and transmit email from John Lucas (.10) Address discovery, claims and action to be taken with 2004 exam (.40), Review and consider email from John Piggens about proposed settlement counteroffer (.20), Address settlement discussions and Piggen's position with Paul Hage and moving forward with 2004 exam of sellers (.20), Email to Paul Neitzel about flow of funds to Michele Sellers and equity held by Mark Sellers (.20).	1.40	700.00
11/02/21	PRH	Review correspondence re scheduling of 2004 examination (.1).	.10	42.50
11/02/21	JGM	Address status and action to be taken on settlement and email from John Piggens with Paul Hage (.60), Email to John Piggens about scheduling 2004 exam of Mark Sellers (.20), Email from John piggens confirming same (.10), Address email frtom Paul Neitzel about transfer to Michele Sellers and email to Jeff Sorcum about same (.20), Email to Paul Neitzel about same (.10).	.70	350.00
11/03/21	PRH	Review correspondence re potential claims (.3). Settlement discussions with J. Piggins (.4).	.70	297.50
11/03/21	LES	Follow up with jason hotzler on Barfly office 365 email processing.	.10	23.00
11/03/21	JGM	Review email from Paul Hage about discovery (.10), Email P. Neitzel and Jim Gansman about payments to Michele Sellers (.10).	.20	100.00
11/04/21	PRH	Discuss seller's 2004 examination strategy with J. Miller.	.20	85.00
11/04/21	LES	Address and consider search terms and dates related to Mark Sellers termination. Emails with kl discovery on searching emails related to Mark Sellers termination.	.50	115.00
11/04/21	JGM	Address noticing of 2004 exam and obtaining a reporter (.10), Address and consider whether financial advisor should attend exam with Paul Hage (.20), Email to Jim Gansman and Paul Neitzel about exam and outstanding deliverables (.30).	.60	300.00
11/05/21	JGM	Address email from John Piggins about noticing exam (.10).	.10	50.00
11/08/21	JGM	Review, revise and address 2004 notice.	.20	100.00
11/09/21	PRH	Discuss 2004 exam issues with J. Miller (.2). Review notices from initial 341 examination (.2).	.40	170.00
11/09/21	JGM	Listen to 341 hearing and take notes thereon in preparation for 2004 exam of Mark Sellers (2.0), Email to Paul Neitzel and Jim Gansman about 2004 exam and other outstanding deliverables (.20), Address status with Paul Hage (.10).	2.30	1,150.00
11/10/21	PRH	Correspondence with trustee professionals regarding fraudulent transfer claims (.3). Phone call with J. Piggins regarding sellers settlement offer (.3), Address 2004 notice issue (.5).	1.10	467.50
11/10/21	JGM	Address emails from Paul Neitzel and Jim Gansman about equity interests held by Mark Sellers, distribution of payments to Michele Sellers, preparing for 2004 exam and attendance at 2004 exam (multiple emails) (.50), Address request by John Piggins for 2 notices for 2004 exams with Paul Hage (.20), Address testimony at 341 exam of Mark Sellers with Paul Hage (.20), Preparation of outline of issues for 2004 exam of Mark Sellers (1.5).	2.40	1,200.00
11/11/21	PRH	Address and consider 2004 issues (.7). Review outline for examination topics and discuss same with J. Miller (.8).	1.50	637.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129726

Date	Atty	Description Of Services Rendered	Hours	Amount
11/11/21	JGM	Preparation of outline for 2004 exam and rule 7030 deposition and preparation for exams (.40), Address same with Paul (.30) Conference call with John Piggins and Hailey about taking of exams (.30), Review and provide comments to notice of deposition (.20), Review and respond to emails from Jim Gansman about exam (.10), Review email from Paul Neitzel about background information (.20).	4.80	2,400.00
11/12/21	PRH	Correspondence regarding 2004 examination topics (.4). Review and consider sellers settlement offer (1.9). Phone calls with J. Piggins, J. Miller and T. Bruinsma regarding same (.9). Settlement discussions with J. Piggins (.4).	3.60	1,530.00
11/12/21	JGM	Address counteroffer from John Piggins and implications with respect to future claims (extensive discussion) and review of applicable case law (multiple calls) with Paul Hage (1.2), Conference call with Paul Hage and Tom Bruinsma about counteroffer and how to proceed (.50), Review and address proposed counteroffer to John Piggins with Paul Hage (.30).	2.00	1,000.00
11/14/21	JGM	Address pulling documents as exhibits for exams (.40), Review, revise and finalize outline for exams (1.0).	1.40	700.00
11/15/21	PRH	Settlement discussions and correspondence with J. Piggins (1.1). Discuss settlement with T. Bruinsma (.2). Address preparation of settlement documents (.7).	2.00	850.00
11/15/21	JGM	Address and consider offer with Paul Hage (.30), Conference call with Paul Hage and John Piggins to address proposed settlement (.30), Review email from Paul to John confirming terms of settlement (.20), Address preparation of stipulations and orders to extend dates and 9019 motion (.30), Review, revise stipulations and orders (.60), Emails to and from Jim Gansman about cancellation of examinations (.10).	1.80	900.00
11/16/21	PRH	Revise settlement related stipulations (.4). Address settlement documents (.7).	1.10	467.50
11/16/21	JGM	Address status, proposed stipulation and order and action to be taken with Paul Hage (.30), Review revised stipulation and order (.10), Review email to John Piggins about same (.10).	.50	250.00
11/17/21	PRH	Correspondence re settlement documentation and edits to adjournment stipulations.	.30	127.50
11/18/21	JGM	Review and revise 9019 motion.	1.50	750.00
11/19/21	JGM	Address entry of orders extending time for taking actions (.10), Continue to review and revise 9019 motion (1.5).	1.60	800.00
11/20/21	PRH	Review and revise seller's 9019 motion.	1.30	552.50
11/22/21	PRH	Discuss comments to 9019 motion with J. Miller.	.20	85.00
11/22/21	JGM	Address 9019 motion and noticing issues for 9019 motion (.30), Review and consider rule 2002 on noticing of 9019 motion (.40), Review docket and order on consolidation to address noticing issues (.40), Review comments and revisions to 9019 motion by Paul Hage (.30).	1.40	700.00
11/23/21	PRH	Correspondence with J. Miller re seller's settlement documents.	.20	85.00
11/23/21	JGM	Emails to and from Lauren Sell about preparation of amended proof of claim and noticing of 9019 motion (multiple emails) (.40), Review, revised and finalize 9019 motion (.40), Review and revise settlement agreement (1.2).	2.00	1,000.00
11/24/21	PRH	Discuss proof of claim and noticing issues with J. Miller.	.30	127.50
11/24/21	LES	Draft amended proof of claim and transmit to Judy for review (1.0). Address motion to be filed with Judy Miller (.5).	1.50	345.00
11/24/21	JGM	Address noticing of 9019 motion and amended proof of claim (.40), Confer with John Piggins about noticing and withdrawal of sellers claim (.20), Address noticing and proof of claim with Paul Hage (.20), Review addendum to original proof of claim and direct Lauren how to amend claim (.20), Review and consider email from Paul about proof of claim (.20).	1.20	600.00
11/29/21	PRH	Address and consider sellers settlement issues.	.40	170.00
11/29/21	JGM	Address impact of settlement on D&O claim (.40)	.40	200.00
11/30/21	PRH	Phone call with J. Miller regarding settlement documents.	.30	127.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129726

Date	Atty	Description Of Services Rendered	Hours	Amount
11/30/21	JGM	Address settlement agreement and limited waiver with Paul Hage (.30), Continue drafting and revising settlement agreement and revise 9019 motion consistent therewith (2.0), Transmit revised documents to Paul to review and approve (.10).	2.40	1,200.00
TOTAL PROFESSIONAL SERVICES				\$ 21,963.00
MATTER TOTAL				\$ 21,963.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	16.00	425.00	6,800.00
Lauren E. Sell	Paralegal	3.10	230.00	713.00
Judith G. Miller	Partner	28.90	500.00	14,450.00
TOTALS		48.00		\$ 21,963.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129726

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
11/22/21 Westlaw charges	16.73
11/24/21 Pacer charges net charges	150.80
TOTAL COSTS ADVANCED	\$ 167.53
MATTER TOTAL	\$ 167.53

December 2021



Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

Tel: 248.351.3000 / Fax: 248.351.3082

www.taftlaw.com

FEIN#: 31-0541755

September 11, 2023
Invoice #: 6129729

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through December 31, 2021:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	6,611.50	.00	6,611.50
DISB	DISBURSEMENTS	.00	2,729.31	2,729.31
Total		6,611.50	2,729.31	9,340.81
TOTAL THIS INVOICE				\$ 9,340.81

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129729

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
12/01/21	PRH	Attention to revisions to 9019 motion and settlement agreement (1.4). Follow up call with J. Miller (.3).	1.70	722.50
12/01/21	JGM	Address Paul's comments to revised 9019 motion and address same with him (.30), Conform settlement agreement to revised motion (.30), Email to Mark Cooper to address D&O question relating to settlement documents (.20).	.80	400.00
12/02/21	PRH	Correspondence with J. Miller regarding settlement pleadings.	.20	85.00
12/02/21	JGM	Email to Tom Bruinsma about proposed settlement documents (.40), Address next steps with Paul (.10).	.50	250.00
12/03/21	JGM	Address outstanding insurance issue with Paul Hage (.10), Reach out to Mark Cooper to address same (.10).	.20	100.00
12/06/21	PRH	Address and consider insurance issues related to settlement pleadings.	.50	212.50
12/06/21	JGM	Address and consider settlement pleadings and insurance issue (.40), Address settlement documents with Tom Bruinsma (.20), Review and revise settlement motion (.40).	1.00	500.00
12/07/21	JGM	Review and revise 9019 motion and settlement agreement (.20), Email to Tom Bruinsma about same (.20).	.40	200.00
12/08/21	PRH	Review correspondence re seller's settlement documents.	.10	42.50
12/08/21	JGM	Review and address email from John Piggins about status of settlement (.20), Address settlement documents with client (.20), Email to John Piggins with settlement documents (.30).	.70	350.00
12/10/21	JGM	Review and consider email and proposed revisions to settlement agreement from John Piggins (.30), Follow up call to address same with John (.30), Email to Paul Hage about same (.30).	.90	450.00
12/13/21	PRH	Review revised settlement agreement and related call and correspondence with J. Miller.	.70	297.50
12/13/21	JGM	Address proposed revised release with Paul Hage (multiple calls) (.30), Address proposed revised release with John Piggins (.30), Review and revise settlement agreement (.50), Transmit revised settlement agreement to John Piggins to review and to approve (.20), Review email with proposed changes from John and email to John to confirm same (.30), Finalize settlement agreement and 9019 motion (.30), Review notice of withdrawal of sellers' claim (.10), Transmit final documents to John for review, approval and execution (.20).	2.20	1,100.00
12/14/21	PRH	Internal correspondence re settlement documents.	.30	127.50
12/14/21	LES	Pull and consolidate mailing matrix for mailing of notice and opportunity on 9019 motion.	.30	69.00
12/14/21	JGM	Review and address emails from John Piggins about settlement documents/pleadings (.30), Review, revise and finalize documents/pleadings (.50), Transmit same to John Piggins (.20), Address filing and service of pleadings/documents (.40).	1.40	700.00
12/15/21	PRH	Various correspondence re sellers settlement documents.	.10	42.50
12/15/21	JGM	Address status of obtaining executed settlement agreement with John Piggins (.20), Address same with Tom Bruinsma (.20), Address filing and service of pleadings and docketing of response dates (.30).	.70	350.00
12/16/21	JGM	Address status of settlement agreement with John Piggins and impact on filing and serving documents.	.10	50.00
12/17/21	PRH	Correspondence regarding sellers settlement documents.	.10	42.50
12/17/21	JGM	Address and respond to email from John Piggins about settlement agreement (.20), Address finalizing and filing motion (.30).	.50	250.00
12/20/21	PRH	Correspondence regarding sellers settlement issues.	.30	127.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129729

Date	Atty	Description Of Services Rendered	Hours	Amount
12/20/21	JGM	Address filing of 9019 motion and responding to John Piggins email about service of notice (.20).	.20	100.00
12/28/21	PRH	Review withdrawal of proof of claim.	.10	42.50
TOTAL PROFESSIONAL SERVICES				\$ 6,611.50
MATTER TOTAL				\$ 6,611.50

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	4.10	425.00	1,742.50
Lauren E. Sell	Paralegal	.30	230.00	69.00
Judith G. Miller	Partner	9.60	500.00	4,800.00
TOTALS		14.00		\$ 6,611.50

Client/Matter # TBC7BV/DISB**Invoice #: 6129729****RE: DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
12/20/21 Postage expense	405.11
12/20/21 Copying/printing	8.40
12/28/21 E-discovery - storage	1,386.30
12/28/21 E-discovery - services	927.50
12/30/21 Telephone charges cc	1.00
12/30/21 Telephone charges cc	1.00
TOTAL COSTS ADVANCED	\$ 2,729.31
MATTER TOTAL	\$ 2,729.31

January 2022



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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129734

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through January 31, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	9,986.50	.00	9,986.50
CASE	CASE ADMINISTRATION	170.00	.00	170.00
DISB	DISBURSEMENTS	.00	1,665.85	1,665.85
Total		10,156.50	1,665.85	11,822.35
TOTAL THIS INVOICE				\$ 11,822.35

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129734

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
1/04/22	PRH	Review sellers financials provided by J. Piggins and related correspondence with T. Bruinsma.	.20	85.00
1/07/22	PRH	Correspondence re notice issues with respect to sellers settlement motion.	.10	42.50
1/07/22	JGM	Address objection time for 9019 motion and filing of certification and proposed order.	.30	150.00
1/10/22	PRH	Review correspondence from K. Klaus. Discuss same with J. Miller.	.20	85.00
1/10/22	JGM	Address request for extension to respond to 9019 motion with Kate Klaus (multiple calls) (.50), Address same with Paul Hage (.10), Review and approve proposed stipulated order to extend time for Zurich to respond to 9019 motion (.20), Docket new response time (.10), Address filing of proposed stipulated order (.10).	1.00	500.00
1/11/22	JGM	Address rejection of proposed order and action to be taken with Kate Klaus (multiple calls) (.50), Advise Paul and client of same (.20).	.70	350.00
1/12/22	JGM	Address discovery issue (.20). Review and respond to email from Peg Anderson about Barfly settlement and scheduling call to discuss same (.20).	.40	200.00
1/13/22	JGM	Address proposed concerns of insurer to 9019 motion (.50), Conference call with Jennifer Suchler and Peg Anderson about same (.50), Advise Paul Hage about same (.10).	1.10	550.00
1/14/22	JGM	Address and consider email from Jennifer Suchler about language to be added to 9019 order and retention of local counsel (.50), Transmit same to Paul Hage with concerns (.20).	.70	350.00
1/16/22	PRH	Phone call with J. Miller regarding informal objection to settlement asserted by insurer.	.30	127.50
1/16/22	JGM	Address and consider proposed language by insurer with Paul Hage (.40), Email to Mark Cooper about same (.20).	.60	300.00
1/17/22	PRH	Correspondence with insurer regarding objection to sellers settlement (.2). Phone calls with J. Miller (.6).	.80	340.00
1/17/22	JGM	Address and consider proposed reservation language (.30), Email to Jennifer Suchler and Peg Anderson about same (.30), Review and respond to emails about scheduling call to address proposed language (.20), Participate in conference call with Jennifer Suchler and Peg Anderson about proposed language, concerns and possible alternatives (.50), Follow up call with Paul Hage about same (.30), Follow up email to Jennifer Suchler and Peg Anderson with proposed revised language for them to consider (.30).	2.00	1,000.00
1/18/22	PRH	Correspondence and calls with J. Miller re resolution of insurance language dispute (.7). Review correspondence from J. Piggins and J. Suchler re same (.2).	.90	382.50
1/18/22	LES	Draft stipulation for order approving 9019 motion and order (.50), call with Judy about same (.20), email to counsel asking for approval to sign off and file stipulation and order (.20).	.90	207.00
1/18/22	JGM	Address and respond to multiple emails about proposed resolution of informal objection asserted by Zurich to 9019 motion with Jennifer Suchler (1.0), Address proposed resolution with Paul Hage (.20), Review and consider email from Mark Cooper about proposed resolution (.20), Address proposed resolution with John Piggins (.20), Review and respond to email from John Piggins about proposed revisions to language to resolve insurer's objections (.30), Preparation of revised order to approve 9019 motion and transmit to parties to review and approve (1.0), Direct Lauren Sell to prepare stipulation to accompany order (.20), Review and revise stipulation with Lauren and direct her to send out to parties for approval (.20), Review emails from parties approving the stipulation and order (.20).	3.50	1,750.00
1/19/22	PRH	Review stipulation re resolution of insider claims and discuss same with J. Miller.	.10	42.50
1/19/22	JGM	Address filing of stipulation and order on 9019 motion.	.10	50.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129734

Date	Atty	Description Of Services Rendered	Hours	Amount
1/24/22	PRH	Correspondence with J. Miller re insider litigation issues.	.20	85.00
1/24/22	JGM	Address email from judge Boyd and Paul Hage about resubmittal of order (.10), Review docket and order to include docket entry (.20), Address next steps with Paul Hage regarding D&O action (.20).	.50	250.00
1/25/22	JGM	Address resubmittal of order on sellers settlement (.10), Address next steps with Paul Hage (.20).	.30	150.00
1/26/22	PRH	Review order approving sellers settlement and related correspondence (.4). Discuss next steps with J. Miller (.2).	.60	255.00
1/26/22	LES	Conference call with Judy Miller concerning amended proof of claim with supplement (.20). Review and revise proof of claim (.50).	.70	161.00
1/26/22	JGM	Address entry of order and docketing dates for order becoming final and filing amended proof of claim in sellers bankruptcy (.20), Transmit and circulate order to John Piggins, Jennifer Suchler and Peg Anderson (.10), Address and direct Lauren Sell regarding amendment and filing of sellers proof of claim (.20), Address proposed email to John Piggins about sellers exam and email to Paul Hage about same (.20), Address amending proof of claim with Lauren Sell (.10), Address exam of sellers with Paul (.20), Review, revise and transmit email to John Piggins about exam (.20), Review and respond to email about revised amended claim from Lauren Sell (.20), Address amended proof of claim with Jennifer Suchler (.10), Follow up call with Lauren Sell about amended proof of claim (.10), Transmit amended proof of claim to John Piggins, Jennifer Suchler and Peg Anderson to review and approve (.20), Address and respond to email from John Piggins about exam (.20), Address and respond to email from John Piggins about amended proof of claim (.20), Address revised language for proof of claim with Jennifer Suchler and Peg Anderson (.10).	2.30	1,150.00
1/27/22	PRH	Various correspondence re revised sellers proof of claim and 2004 examination.	.30	127.50
1/27/22	LES	Make revisions to amended proof of claim per John Piggins comments and send to attorney to review.	.20	46.00
1/27/22	JGM	Address and respond to email from Jennifer Suchler about proof of claims (.20), Direct Lauren Sell to revise proof of claim with new language (.10), Address scheduling of sellers exam (.30), Confirm date for exam with John Piggins (.10), Review revised proof of claim and email to Lauren about revisions and filing (.10), Email to John Piggins about filing revised claim and withdrawal (.10), Review and respond to email from John Piggins about payment of \$3,000 (.10), Address same with Paul Hage (.10), Email to Thomas Bruinsma about payment of \$3,000 under 9019 settlement (.10).	1.20	600.00
1/28/22	JGM	Address exhibits for deposition (.20), Address scheduling of court reporter for deposition (.20).	.40	200.00
1/31/22	JGM	Address quarterly report and status of other recovery efforts with Tom Bruinsma and Paul Hage (.30), Review email about anticipated distribution under sellers plan (.10), Email to John Piggins about escrowed plan payments (.20), Email to Paul Neitzel about preference analysis (.30).	.90	450.00

TOTAL PROFESSIONAL SERVICES \$ 9,986.50

MATTER TOTAL \$ 9,986.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129734

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	3.70	425.00	1,572.50
Lauren E. Sell	Paralegal	1.80	230.00	414.00
Judith G. Miller	Partner	16.00	500.00	8,000.00
TOTALS		21.50		\$ 9,986.50

Taft Stettinius & Hollister

Client/Matter # TBC7BV/CASE**Invoice #: 6129734****RE: CASE ADMINISTRATION****PROFESSIONAL SERVICES RENDERED**

Date	Atty	Description Of Services Rendered	Hours	Amount
1/31/22	PRH	Correspondence and call with T. Bruinsma and J. Miller re trust issues.	.40	170.00
TOTAL PROFESSIONAL SERVICES				\$ 170.00
MATTER TOTAL				\$ 170.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.40	425.00	170.00
TOTALS		.40		\$ 170.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129734

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
1/28/22 Postage expense	11.65
1/28/22 Copying/printing	262.20
1/28/22 E-discovery - storage	1,392.00
TOTAL COSTS ADVANCED	\$ 1,665.85
MATTER TOTAL	\$ 1,665.85

February 2022



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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129737

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through February 28, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	30,848.00	.00	30,848.00
DISB	DISBURSEMENTS	.00	3,086.07	3,086.07
Total		30,848.00	3,086.07	33,934.07
TOTAL THIS INVOICE				\$ 33,934.07

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129737

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
2/01/22	PRH	Correspondence and call with J. Miller re sellers distributions.	.10	42.50
2/01/22	JGM	Address email from Paul Neitzel (.10), Review email from Paul Hage to Paul Neitzel about 90 day payments (.10), Review documents in sharefile as relates to payments made during 90 day period (.30), Address same with Paul Hage (.10), Call with Paul Neitzel regarding creating excel spreadsheet for 90 day payments and upcoming sellers exam (.30), Review and respond to email from John Piggins about plan payments (.20).	1.10	550.00
2/02/22	PRH	Correspondence and calls with J. Miller re sellers catch-up distributions (.4). Review and revise default letter (.3).	.70	297.50
2/02/22	JGM	Review and consider email from John Piggins about default under plan (.20), Address and consider action to be taken with Paul Hage (multiple calls) (.30), Address same with Tom Bruinsma (.20), Email to Tom Bruinsma to confirm action to be taken (.20), Review and respond to email from Kate Klaus regarding attending at sellers exam (.20), Review Chapter 11 plan of sellers and advise Paul about same (.60), Preparation of proposed letter to John Piggins about default under plan (.2.0).	3.70	1,850.00
2/03/22	PRH	Discuss sellers demand letter with J. Miller.	.20	85.00
2/03/22	JGM	Address and consider email from Paul Hage about proposed letter to John Piggins (.30), Follow up call with Paul Hage about same (.20), Review, revise and finalize letter and transmit to Tom Bruinsma to review and approve (.50).	1.00	500.00
2/04/22	JGM	Address preparation for sellers' exam (.40), Address same with Kim Clayson (.40).	.80	400.00
2/07/22	JGM	Emails to and from Paul Neitzel regarding scheduling of call to prepare for sellers' exam (.20), Address scheduling of same with Kim Clayson (.10), Schedule exam (.10).	.40	200.00
2/09/22	PRH	Phone call and correspondence with J. Miller re 2004 strategy.	.20	85.00
2/09/22	JGM	Email to Tom Bruinsma to address proposed letter to be sent to John Piggins about default under plan (.20), Review documents and pleadings in preparation for examination of Mark Sellers and assemble exhibits for deposition (3.0), Review hot emails (2.0).	5.20	2,600.00
2/09/22	KRC	Initial review 2004 exam outline and exhibits to prepare for exam.	.20	70.00
2/10/22	PRH	Review correspondence re sellers issues, amended claim (.2). Review withdrawal of claim by M. Sellers (.1).	.30	127.50
2/10/22	JAN	Export "hot" documents from relativity, convert excel file to pdf for printing, organize into binders and emails.	1.20	288.00
2/10/22	JGM	Address how to proceed with proposed letter with Thomas Bruinsma, confirmation of transmittal of check to John Piggins, status of case and action to be taken and exam of sellers (multiple calls) (.30), Address timing letter with Paul Hage (.20), Review, revise and finalize letter (.20), Transmit letter to John Piggins (.10), Address filing of amended proof of claim in sellers Chapter 11 (.30), Address filing of withdrawal of claim by sellers in Barfly case (.30), Transmit amended claim to John Piggins, Jennifer Suchler and Peg Anderson (.10), Transmit withdrawal of claim to Thomas Bruinsma (.10), Review and respond to email from John Piggins seeking confirmation of transmittal of reimbursement check (.20), Address exhibits for sellers' deposition with Julie Norton (multiple calls) (.30), Address preparation for exam with Kim Clayson and Paul Neitzel (.30), Address Innovo issues and documents with Jay Welford (.20), Update and revise outline for exam (1.0), Review emails and documents in connection therewith (.30).	3.90	1,950.00
2/10/22	KRC	Review and preparation of exhibit for M. Sellers exam.	.30	105.00
2/10/22	KRC	Address exhibits and 2004 examination outline.	.20	70.00
2/10/22	KRC	Address preparation of exam exhibits.	1.00	350.00

Client/Matter # TBC7BV/ASSETA**Invoice #: 6129737**

Date	Atty	Description Of Services Rendered	Hours	Amount
2/11/22	PRH	Address court notices with respect to withdrawal of claims (.2). Phone call with J. Miller regarding 2004 exam strategy (.2).	.40	170.00
2/11/22	JGM	Review exhibits for deposition of sellers (2.0), Address conducting exam with Julie Norton and Kim Clayson (.30), Review emails from Jay Welford regarding Innovate (1.0).	3.30	1,650.00
2/11/22	KRC	Address exhibit preparation for 2004 exam.	.10	35.00
2/11/22	KRC	Email to support team for setting up exhibit links.	.10	35.00
2/13/22	JGM	Review and prepare exhibits for sellers exam and revise outline consistent therewith.	3.50	1,750.00
2/14/22	PRH	Various correspondence with J. Miller and P. Neitzel regarding sellers deposition and insider and preferential transfers.	.20	85.00
2/14/22	JGM	Address preparation of exhibits for sellers exam (1.5), Review and confirm exhibit list (.30), Conference call with Paul Neitzel, Jim Gansman and Kim Clayson about preparation for sellers exam (.50), Email to John Piggins and Kate Klaus about sellers exam (.20), Email to Paul Neitzel and Jim Gansman about exam, exhibits and preference analysis (.20), Call and email from John Piggins about exam (.20), Address exam and exhibits with Kate Klaus (.20), Address preparation for exam (.50), Address follow up emails to and from court reporter about exhibits (.10), Address email from Paul Neitzel on preference analysis (.10).	3.80	1,900.00
2/14/22	KRC	Review of exhibits and preparation for exam.	1.80	630.00
2/14/22	KRC	Exam preparation call with Paul and Jim.	.50	175.00
2/14/22	KRC	Emails to court reporter and financial advisors about exam exhibits.	.20	70.00
2/14/22	KRC	Further exhibit preparation and compilation for 2004 exam.	1.20	420.00
2/15/22	JGM	Address emails from Paul Neitzel and scheduling a meeting to address preference analysis (.30), Prepare for deposition of Mark Sellers and update outline in connection therewith (6.0), Update and circulate revised outline (.40), Review comments from Paul Neitzel and update and circulate revised outline (.40), Address documents and exam with Paul Neitzel (multiple calls) (.40).	7.50	3,750.00
2/15/22	KRC	Review of preference analysis.	.30	105.00
2/15/22	KRC	Read and reviewed exam exhibits to prepare for 2004 examination.	2.60	910.00
2/15/22	KRC	Draft and review of notices of appearance in sellers and Barfly.	.20	70.00
2/16/22	PRH	Discuss 2004 examination of M. Sellers with J. Miller and K. Clayson.	.50	212.50
2/16/22	JGM	Attend deposition of Mark Sellers (6.5), Address deposition with Paul Hage and Kim Clayson and next steps (.50).	7.00	3,500.00
2/16/22	KRC	Preparation for and attendance at 2004 examination.	7.10	2,485.00
2/21/22	JGM	Review and analyze preference documents transmitted by Paul Neitzel (.50), Participate in conference call with Paul Neitzel and Kim Clayson regarding preference analysis and action to be taken (.50), Review and respond to email from Paul Neitzel regarding follow through and documents to be obtained from creditor (.30).	1.30	650.00
2/21/22	KRC	Meeting with financial advisors about preference analysis.	.30	105.00
2/21/22	KRC	Review of FA's support documents for preference analysis as to Paladin. Email inquiry to FA regarding the same.	.20	70.00
2/25/22	JGM	Preparation of memo to client to address and summarize Mark Sellers deposition and proposed next steps.	1.00	500.00
2/28/22	JGM	Preparation of memo to client about sellers' exam and next step (4.0).	4.00	2,000.00

TOTAL PROFESSIONAL SERVICES**\$ 30,848.00****MATTER TOTAL****\$ 30,848.00**

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129737

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	2.60	425.00	1,105.00
Julie A. Norton	Paralegal	1.20	240.00	288.00
Judith G. Miller	Partner	47.50	500.00	23,750.00
Kimberly Clayson	Partner	16.30	350.00	5,705.00
TOTALS		67.60		\$ 30,848.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129737

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
2/09/22 Tracking number: 1z17a5051522478144	87.92
2/16/22 Copying/printing	102.45
2/25/22 E-discovery - storage	1,408.05
2/28/22 E-discovery - storage	1,421.40
2/28/22 E-discovery - services	66.25
TOTAL COSTS ADVANCED	\$ 3,086.07
MATTER TOTAL	\$ 3,086.07

March 2022



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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129776

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through March 31, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	21,731.00	.00	21,731.00
DISB	DISBURSEMENTS	.00	3,594.00	3,594.00
Total		21,731.00	3,594.00	25,325.00
TOTAL THIS INVOICE				\$ 25,325.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129776

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
3/01/22	PRH	Review draft memorandum from J. Miller re sellers strategy.	.40	170.00
3/01/22	JGM	Address receipt of manuscript and exhibits from court reporter (.20), Review email and comments from Kim Clayson about memo to client (.40), Review and revise memo (1.0), Transmit memo to Paul Neitzel and Jim Gansman to review and to provide comments (.20).	1.80	900.00
3/01/22	KRC	Review and edits of memo to client outlining 2004 investigation on sellers and review of related 2004 exam exhibits to update memo.	1.80	630.00
3/01/22	KRC	Review of Paladin invoices to track payments against billings for preference analysis.	1.00	350.00
3/02/22	PRH	Correspondence with trustee team re insider investigation.	.20	85.00
3/02/22	JGM	Review email from Paul Neitzel regarding memo and Paladin (.10), Review Paladin documents (.20), Review email/comments from Jim Gansman on memo and responsive email to him (.20), Review, revise and finalize memo to client (1.0), Follow up call with Paul Neitzel about memo (.10), Email to Tom Bruinsma with memo (.20).	1.80	900.00
3/04/22	PRH	Correspondence with J. Miller re litigation strategy.	.10	42.50
3/04/22	JGM	Address status and scheduling of a call with Tom Bruinsma about how to proceed (.20), Email to client professionals to address scheduling a call with client (.10).	.30	150.00
3/07/22	PRH	Correspondence with J. Miller re objection filed by creditors.	.10	42.50
3/07/22	JGM	Review and address objection filed to withdrawal of claim (.20), Schedule call with client to address next steps (.10), Address notice from court on objection to withdrawal of claim (.10), Address action to be taken with Paul Hage (.10).	.70	350.00
3/10/22	JGM	Prepare for conference call with client to address next steps (1.0), Participate in conference call with client, Jaffe team, Paul Neitzel and Jim Gansman to address status and next steps (1.0), Address preparation of the attachment for preference demand for paladin with Paul Neitzel (.20), Prepare preference demand to paladin (1.0), Transmit preference demand to Kim to review (.20).	3.40	1,700.00
3/10/22	KRC	Conference call with trustee to discuss litigation strategy based on findings of 2004 examination.	1.00	350.00
3/11/22	JGM	Email to John Piggins about addressing default under plan with sellers (.20), Email from Paul Neitzel about paladin transfer (.10), Exchange emails with Kim Clayson about same and proposed revisions to demand letter (.30), Email to Tom Bruinsma about transfers to paladin (.10).	.70	350.00
3/11/22	KRC	Edits to letter, review of revised preference analysis and email to client for approval of letter.	.50	175.00
3/14/22	PRH	Correspondence re resolution of sellers plan issue and insider claims.	.20	85.00
3/14/22	JGM	Confer with John Piggins about curing of default under plan by Mark Sellers (.10), Advise Paul Hage about same (.10), Email to and from Tom Bruinsma about cure under plan by sellers (.20), Address transmittal of demand letter to paladin (.20), Address attachment to letter and next steps (.20), Review revised chart and provide comments to Kim (.20).	1.00	500.00
3/14/22	KRC	Attention to preference demand letter, final review for approval to mail.	.10	35.00
3/14/22	KRC	Revisions to preference transfer spreadsheet for sending with letter.	.20	70.00
3/15/22	JGM	Address lack of response from Nick Meserve at Mainstreet (.10), Emails to and from Paul Neitzel regarding same (.20), Address email from Nick Meserve with Paul Neitzel (.20), Address same with Paul Hage (.30), Advise to matt murphy about scheduling call (.10).	.90	450.00
3/16/22	JGM	Call with matt murphy to address scheduling call with Nick Meserve (.40), Advise Paul Hage about same (.10).	.50	250.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129776

Date	Atty	Description Of Services Rendered	Hours	Amount
3/17/22	JGM	Emails from and to matt murphy about scheduling call with Nick Meserve (.20), Address scheduling call with Kim Clayson, Paul Neitzel and Jim Gansman (.20).	.40	200.00
3/21/22	JGM	Review correspondence from John Piggins about payment of cure amount.	.10	50.00
3/22/22	JAN	Address searches to prepare in the preprocessor, review data currently in relativity, and emails with KLD regarding searching emails extracted from a pdf portfolio.	.80	192.00
3/22/22	JGM	Address discovery issues with Julie Norton (.10), Address review of employee emails, preparation of draft complaint against Michele Sellers and D&O complaint issues with Kim Clayson (.30).	.40	200.00
3/22/22	KRC	Preparation and communication for support on email search on relativity to conduct further investigation of board member and officer conduct.	.50	175.00
3/22/22	KRC	Preparation of avoidance lawsuit against Michele Sellers and research regarding counts and outline of complaint.	1.00	350.00
3/23/22	JAN	Address searches of email addresses and key words in the preprocessor, search relativity for specific email addresses, draft detailed search request.	1.50	360.00
3/23/22	JGM	Address discovery to be done and next steps with Paul Hage (.20), Participate in conference call with Kim Clayson and Julie Norton on discovery to be undertaken (.50), Address documents and other issues with Kim Clayson and Paul Neitzel (.20), Review relevant documents in relativity (.30).	1.20	600.00
3/23/22	KRC	Review of records and facts as part of drafting complaint against Michele Sellers.	2.80	980.00
3/23/22	KRC	Review documents for preference complaint and to investigate email documents needed for establishing other possible causes of action.	.70	245.00
3/23/22	KRC	Review of facts and documents for preparation of complaint and started on drafting preparation of complaint.	2.60	910.00
3/24/22	JAN	Review and analyze search hit report and emails with KLD regarding efficacy of the searches, review updated search results (.50), emails with KLD regarding promoting results to relativity and creating additional sub-searches (.30), and emails with Judy Miller and Kim Clayson regarding same (.20).	1.00	240.00
3/24/22	JGM	Address and direct Kim Clayson regarding issues to address with adversary proceeding (.40), Address and consider email from Paul Hage about stip and order to lift automatic stay as relates to naming Mark Sellers as defendant in Michele Sellers action (.20), Review and respond to emails from Paul Neitzel regarding same (.30), Address e-discovery issues with Julie Norton (.30).	1.20	600.00
3/24/22	KRC	Review documents and agreements as relates to analysis for fraudulent transfer lawsuit against sellers.	1.10	385.00
3/24/22	KRC	Communication with financial advisors to determine insolvency.	.20	70.00
3/24/22	KRC	Further drafting of fraudulent transfer complaint.	1.20	420.00
3/25/22	JGM	Address emails concerning Ediscovery (.50), Review documents produced via Ediscovery (1.5).	2.00	1,000.00
3/25/22	KRC	Analysis of factors of knowledge for fraudulent transfers, review of financial records and drafting of allegations related to knowledge.	1.40	490.00
3/28/22	JGM	Address review of emails, solvency analysis and theories for recovery.	.30	150.00
3/28/22	KRC	Call with Chris Peirce about questions on insolvency findings.	.30	105.00
3/28/22	KRC	Initial review of email search results regarding Mark Gray communications.	.50	175.00
3/28/22	KRC	Further drafting of complaint - edits to fact allegations and research on drafting of mi uniform fraudulent counts to complaint.	1.40	490.00
3/29/22	KRC	Further research, review of facts and records for drafting fraudulent transfer complaint.	2.40	840.00
3/29/22	KRC	Review of emails for D&O claims.	2.90	1,015.00
3/30/22	LES	Address review of Barfly emails that are related to St. Louis, Royal Oak and Port St. Lucie locations.	.10	23.00
3/30/22	LES	Review Barfly email discovery for references to tenant improvements, rental costs, at Market and Above Market rates for properties, Market Analysis and due diligence and Mark Gray stock purchases.	1.00	230.00
3/30/22	JGM	Review E-Discovery and interview of Nick Meserve.	3.00	1,500.00
3/30/22	KRC	Continued review of email search for D&O issues.	2.20	770.00

Taft Stettinius & Hollister LLP

Client/Matter # TBC7BV/ASSETA**Invoice #: 6129776**

Date	Atty	Description Of Services Rendered	Hours	Amount
3/30/22	KRC	Address and consider searches of emails, potential claims and strategy for call with third party about board conduct.	.70	245.00
3/30/22	KRC	Call with Nick Meserve and follow up discussions post call with Judy and P. Neitzel.	1.00	350.00
3/31/22	JAN	Emails with Lauren Sell regarding document review in relativity and update all searches to include relevancy and hot fields.	.40	96.00
3/31/22	LES	Review Barfly email discovery for references to tenant improvements, rental costs, at Market and Above Market Rates for Properties, Market Analysis and Due Diligence, Mark Gray stock purchases.	3.00	690.00

TOTAL PROFESSIONAL SERVICES \$ 21,731.00

MATTER TOTAL \$ 21,731.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	1.00	425.00	425.00
Julie A. Norton	Paralegal	3.70	240.00	888.00
Lauren E. Sell	Paralegal	4.10	230.00	943.00
Judith G. Miller	Partner	19.70	500.00	9,850.00
Kimberly Clayson	Partner	27.50	350.00	9,625.00
TOTALS		56.00		\$ 21,731.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129776

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
3/01/22 Transcript fees -- vendor: gerald hanson & associates, inc.	1,445.85
3/07/22 Pacer charges net charges	25.40
3/09/22 Copying/printing	.15
3/31/22 E-discovery - storage	1,467.60
3/31/22 E-discovery - services	655.00
TOTAL COSTS ADVANCED	\$ 3,594.00
MATTER TOTAL	\$ 3,594.00

April 2022

Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

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www.taftlaw.com

FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129785

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through April 30, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	35,822.00	.00	35,822.00
DISB	DISBURSEMENTS	.00	1,487.70	1,487.70
Total		35,822.00	1,487.70	37,309.70
TOTAL THIS INVOICE				\$ 37,309.70

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129785

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
4/01/22	PRH	Review motion for stay relief re D&O insurance policy.	.20	87.00
4/01/22	LES	Review Barfly email discovery for references to tenant improvements, rental costs, at Market and Above market rates for properties, Market Analysis and due diligence, Mark Gray stock purchases.	3.00	705.00
4/01/22	JGM	Confer with Travis Baldwin about upcoming call (.20), Address filing of motion by Kate Klaus and docketing of response time (.20).	.40	200.00
4/01/22	KRC	Coordinated meeting with congruent representative.	.20	70.00
4/01/22	KRC	Follow up to n. Merserve's counsel requesting email records.	.10	35.00
4/01/22	KRC	Review of records for supporting exhibits to complaint.	.80	280.00
4/01/22	KRC	Drafting of complaint - insertion of relevant dates and facts pertaining to the point of insolvency.	1.20	420.00
4/04/22	PRH	Discuss stay relief motion re insurance proceeds with J. Miller.	.20	87.00
4/04/22	JGM	Review email from Travis Baldwin about upcoming conference call (.20), Email to matt murphy about call with Travis Baldwin (.30), Call with Travis Baldwin about reasons for upcoming call (.30), Address motion filed by Kate Klaus with Paul Hage (.30), Confer with Kate Klaus about motion and proposed stipulation and order subject to reasonableness review (.30).	1.40	700.00
4/04/22	KRC	Email follow up to financial advisors on insolvency analysis.	.10	35.00
4/05/22	PRH	Phone call with J. Lucas regarding preference demand letter to Paladin.	.20	87.00
4/05/22	LES	Conference call with attorney concerning updated mailing address on proof of claim for payment.	.10	23.50
4/05/22	JGM	Participate in conference call with Kim Clayson, Chris and Paul about solvency analysis and other pending issues (.50), Follow up call with Kim Clayson about other issues related to breaches of fiduciary duties (.30), Review and respond to emails from Paul Neitzel about securing additional documents and NDA with real estate valuation experts (.40), Review proposed NDA and provide comments to Paul Neitzel (.30), Prepare for call with Travis Baldwin (.40), Conference call with Travis Baldwin, Paul Neitzel and Kim Clayson about background facts attendant to Barfly (.80), Follow up call with Kim Clayson about information obtained from baldwin (.30), Review email from Paul Neitzel to Matt at Conguent about financial records (.20), Follow up emails with Paul Neitzel about retention of valuation expert and proposed NDA's (.50), Address securing employment agreements with Paul Neitzel (.20), Review email from matt murphy about Baldwin call (.10), Address action to be taken in response to motion for use of property to pay insurance counsel fees with Paul Hage (.20), Call with Kate Klaus about same (.30).	4.50	2,250.00
4/05/22	KRC	Call with financial advisors and further discussion with Judy on insolvency analysis and breach analysis.	.90	315.00
4/05/22	KRC	Address D & O Claims.	.30	105.00
4/05/22	KRC	Interview with Travis Baldwin.	.80	280.00
4/06/22	LES	Review Barfly email discovery for references to Tenant Improvements, Rental costs, at Market and Above Market rates for properties, Market Analysis and due diligence, Mark Gray stock purchases.	3.00	705.00
4/06/22	JGM	Address NDA's for Valuation experts (1.5), Exchange emails with Matt Bordin about same (multiple emails) (.40), Advise and email to Kenny at JLL valuation advisory about same (.30), Address stipulation and order with Kate Klaus (.30), Address NDA, lift stay stipulation and order and receipt of payments and quarterly financial reports with Tom Bruinsma (.20), Review and revise adversary complaint against Michele Sellers (1.5).	4.20	2,100.00
4/06/22	KRC	Address standing for D&O claims.	.10	35.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129785

Date	Atty	Description Of Services Rendered	Hours	Amount
4/07/22	JGM	Email from Matt Bordwin about lease evaluation proposal (.10), Address other options for retention of lease valuation proposals (.20).	.30	150.00
4/08/22	JGM	Review and revise complaint against Michele Sellers (5.0), Research various documents/transcripts in connection with complaint (.60), Address potential engagement with Kenny at ILL Valuation Advisory and how to proceed (.40).	6.00	3,000.00
4/08/22	KRC	Analyzed settlement documents on question of automatic stay, review of settlement terms and Ch. 11 plan to determine impact on a fraudulent transfer claim.	1.00	350.00
4/08/22	KRC	Address and consider documents needed to support complaint.	.20	70.00
4/08/22	KRC	Reviewed order confirming plan to verify terms and sent to client (.20).	.10	35.00
4/11/22	PRH	Discuss lease analysis issue with J. Miller and related correspondence.	.30	130.50
4/11/22	JGM	Review and consider response from paladin to preference demand (.30), Address potential engagement for valuation purposes with Russ Long (.30), Transmit NDA to Russ Long along with email explaining work needed (.20), Advise Paul Neitzel about status, action to be taken and solvency analysis (.20), Address preference response with Kim Clayson (.20), Address status of stipulation and order with Kate Klaus and whether need to lift automatic stay (.20), Address preference demand and response with John Lucas (.10), Address proposed engagement with JLL (.30), Transmit executed NDA and documents to Russ Long with action to be taken (.30), Continue review and revision of complaint (3.5).	5.60	2,800.00
4/12/22	JGM	Address emails from Paul Neitzel about documents requested and needed for complaint (multiple emails) (.40), Address complaint and revisions needed with Kim Clayson (.40), Review and respond to email from Kate Klaus about stipulation and order on payment of fees, extension to objection and application of automatic stay (multiple emails) (.40), Docket new date to respond to fee payment motion (.10).	1.30	650.00
4/12/22	KRC	Review of financial details and additions to the Michele Sellers complaint.	1.50	525.00
4/12/22	KRC	Review and consider revisions/notes on complaint from J. Miller.	.50	175.00
4/13/22	JGM	Address tagged emails with Julie Norton (.20), Review "hot and relevant" emails (2.5), Address and consider action to be taken on adversary complaints (.50).	3.20	1,600.00
4/14/22	JGM	Address review of emails and action to be taken (.30), Research of fraudulent conveyance issues (.60), Research D&O complaints (.70), Continue review of emails (2.5).	4.10	2,050.00
4/19/22	JGM	Address status of valuation analysis with Russ Long (.10).	.10	50.00
4/20/22	JGM	Additional follow up with Russ Long about valuation analysis.	.20	100.00
4/20/22	KRC	Meeting with financial advisor and follow up discussion with J. Miller on insolvency issue.	.90	315.00
4/21/22	JGM	Follow up email to Kate Klaus about status of stipulation and order to resolve motion on payment of fees (.40), Review and respond to email from Russ Long about status of valuation analysis (.20), Review and respond to email from Kate Klaus about stipulation and order (.10), Continue review of emails (2.5, Conference call with Paul, Chris, and Kim about solvency analysis (.50).	3.70	1,850.00
4/22/22	JGM	Continued conference call with Paul and Kim on solvency analysis (.30), Follow up call with Kim about next steps (.30), Confer with Russ Long about valuation analysis and next steps (.20), Review and consider email from Kate Klaus about position on payment of fees from insurance policy (.30), Email to Kate Klaus about same (.10), Review new notices of appearance filed by Mark Sellers (.20).	1.40	700.00
4/22/22	KRC	Phone call with financial advisors in follow up on insolvency analysis and call with J. Miller in follow up.	.40	140.00
4/25/22	PRH	Conference call with J. Miller and K. Clayson re status of insider investigation, complaint.	.70	304.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129785

Date	Atty	Description Of Services Rendered	Hours	Amount
4/25/22	JGM	Conference call with Kim Clayson and Paul Hage about various issues (preference demand, payment of fees to insurance counsel and adversary proceedings) (.50), Review case law governing treatment of insurance policies by bankruptcy courts (1.0), Review memo on analysis of D&O insurance policy (.40), Address payment of fees from insurance policy and action to be taken with Tom Bruinsma (.20), Email to and from Kate Klaus about same and proposed counteroffer of how to resolve motion (.40), Continue review of emails (2.0), Review new appearances filed by counsel from Miller Johnson (.20).	4.70	2,350.00
4/25/22	KRC	In-office conference to discuss viability of D&O claims and what to pursue.	.60	210.00
4/25/22	KRC	Revisions and edits to draft complaint factual averments and counts.	2.60	910.00
4/26/22	LES	Review Board Minutes addressed Directors recusing themselves from voting and mention of real estate matters involving Innovo, Royal Oak Lease, St. Louis Lease and Port St. Lucie Lease.	1.50	352.50
4/26/22	JGM	Continue to review e-discovery (2.50), Address review of board minutes and direct Lauren Sell to do same and exchange emails with her (40).	2.90	1,450.00
4/26/22	KRC	Reviewed analysis of D&O coverage to analyze means for estate recovery.	.80	280.00
4/26/22	KRC	Reviewed Insurance Coverage memo to support revisions to complaint.	.50	175.00
4/27/22	JGM	Address and direct Review of Board Minutes with Lauren Sell (.20), Review and consider email from Lauren Sell on same (.20), Address proposed resolution on motion with Kate Klaus and Jennifer Suchler (.30), Address and consider damages issues and capital infusions (.20), Advise to Paul Neitzel about same (.10), Complete review of emails (2.0).	3.00	1,500.00
4/27/22	KRC	Edits to complaint to reflect memo on Insurance Coverage.	.60	210.00
4/28/22	JGM	Address damages and cash infusions with Paul Neitzel (.20), Emails to and from Kate Klaus about comfort order (.30), Email from Jennifer Suchler regarding comfort order (.10), Review and revise complaint (2.0), Address additional counts for complaint and research of limited liability company action (.30).	2.90	1,450.00
4/28/22	KRC	Address additional counts under limited liability act and other facts to include.	.30	105.00
4/28/22	KRC	Research on limited liability act and member distributions and prohibited transactions.	.50	175.00
4/29/22	JGM	Review emails on limited liability research (.50), Follow up call with Kim Clayson about same (.40), Email to Paul Neitzel about Mark Sellers compensation (.10), Work on D&O complaint (2.5).	3.50	1,750.00
4/29/22	KRC	Research on fiduciary duty statutes under Michigan limited liability act.	.40	140.00
4/30/22	JGM	Continue to review and revise the Adversary complaint.	2.50	1,250.00

TOTAL PROFESSIONAL SERVICES \$ 35,822.00

MATTER TOTAL \$ 35,822.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	1.60	435.00	696.00
Lauren E. Sell	Paralegal	7.60	235.00	1,786.00
Judith G. Miller	Partner	55.90	500.00	27,950.00
Kimberly Clayson	Partner	15.40	350.00	5,390.00
TOTALS		80.50		\$ 35,822.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129785

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
4/30/22 E-discovery - storage	1,487.70
TOTAL COSTS ADVANCED	\$ 1,487.70
MATTER TOTAL	\$ 1,487.70

May 2022



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129787

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through May 31, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	37,675.00	.00	37,675.00
DISB	DISBURSEMENTS	.00	2,211.36	2,211.36
Total		37,675.00	2,211.36	39,886.36
TOTAL THIS INVOICE		\$ 39,886.36		

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129787

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
5/02/22	PRH	Address and consider insider complaint issues.	.20	87.00
5/02/22	JGM	Email to Kate Klaus and Jennifer Suchler about status of proposed order to resolve motion and extension of time to respond (.20), Follow up email and call with Kate Klaus regarding same (.20), Email from Kate Klaus about order (.10), Address adversary complaint and how to proceed with Paul Hage (.20), Follow up call with Kim Clayson about same (.20), Review and revise D&O complaint (2.5), Exchange emails with Paul Neitzel about due diligence documents and information for complaints (.30), Email from Russ Long about status of valuation information (.10).	3.80	1,900.00
5/03/22	JGM	Address email from russ long providing update on valuation information (.10), Review and revise proposed order resolving Maddin Hauser's motion, prepare stipulation to accompany motion and transmit pleadings to Kate Klaus and Jennifer Suchler to review and to approve (1.2), Follow up call with Kate Klaus about same (.10), Continue working on preparation of D&O adversary complaint (3.0), Address Corporate Governance issues (.20), Advise from Jennifer Suchler approving revised pleadings (.10).	4.70	2,350.00
5/03/22	KRC	Revised 3rd restated operating agreement to identify llc management structure.	.80	280.00
5/03/22	KRC	Address Structure for Complaint.	.20	70.00
5/04/22	JAN	Search for all Gray emails coded with attorney notes, export, format, and organize documents for printing and advise with Judy Miller, Ricoh, and KLD regarding same.	1.70	425.00
5/04/22	JGM	Email to Tom Bruinsma about stipulation and order to resolve Maddin Hauser motion (.20), Review and respond to email from Paul Neitzel about analysis and scheduling call to address same (.20), Address and consider Corporate Governance for complaint (.20), Continue working on complaint (4.0), Address filing of Stipulation and Order with Kate Klaus (.20), Address reviewed emails with comments with Julie Norton (.30).	5.10	2,550.00
5/05/22	JGM	Review email and attachments forwarded by Paul Neitzel on solvency, compensation and capital structure in preparation for call (.40), Participate in conference call with Paul Neitzel, Jim Gansman and Kim Clayson about various issues for adversary complaint, how to proceed and scheduling follow up call (.40), Continue work on adversary proceeding (3.5).	4.00	2,000.00
5/05/22	KRC	Call with financial advisors about damages claim and remaining items for preparation of complaint.	.50	175.00
5/05/22	KRC	Recap email to financial advisors of remaining documents needed and analysis needed.	.30	105.00
5/06/22	JGM	Review notice from court about problem with stipulation and order submitted (.20), Address same with Kate Klaus (.20), Review email from Paul Neitzel about comments to adversary proceeding (.30), continue to prepare, review and revise adversary complaint (2.0), Research on authority to make distributions under the limited liability act (.50), Review operating agreement as relates to authority to make distributions (.30).	3.50	1,750.00
5/06/22	KRC	Edits to complaint to incorporate financial advisor notes.	.50	175.00
5/09/22	JGM	Address complaint and various issues related thereto and consider next steps (.30), Review and consider article forwarded by Paul Neitzel (.30).	.60	300.00
5/10/22	PRH	Review draft complaint and related correspondence with Jaffe team.	4.30	1,870.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129787

Date	Atty	Description Of Services Rendered	Hours	Amount
5/10/22	JGM	Address and consider proposed comments on corporate issues in complaint from (.30), Address and consider comments of Paul Hage to draft complaint (1.5), Follow up calls (multiple calls) with Paul Hage about same and next steps (1.0), Revise draft complaint with respect to fraudulent conveyance counts (.50), Email to Tom Bruinsma about draft complaint and scheduling call to address same (.30), Call with Paul Neitzel about outstanding issues (compensation, distributions, capital structure, and operating agreements (.40).	4.00	2,000.00
5/11/22	PRH	Discuss insider complaint issues with J. Miller.	.80	348.00
5/11/22	JGM	Address strategy and how to move forward with complaint (.60), Address Distributions under Operating Agreement and Articles (.20), Direct Kim Clayson to review articles and operating agreements (.20), Address email from Paul Neitzel about operating agreements (.20), Review and revise complaint (4.0), Review and respond to email from Tom Bruinsma about scheduling call to address draft complaint (.20).	5.40	2,700.00
5/12/22	JGM	Address draft complaint and various issues related thereto with Paul Hage (.80), Address complaint and additional issues to address with Kim Clayson (.40), Address docketing of hearing on motion of insurer's counsel (.10), Review and revise complaint (5.5).	6.80	3,400.00
5/12/22	KRC	Review Operation Agreements to confirm accuracy of fact allegations in complaint on terms of agreements.	1.80	630.00
5/13/22	PRH	Review damages calculation and related correspondence (.2). Attend strategy call re complaint with T. Bruinsma (.7).	.90	391.50
5/13/22	JGM	Complete revision of draft complaint (2.0), Conference call with Paul Neitzel and Kim Clayson about additional information and analysis for complaint on sellers compensation, damages, pr and exhibits for complaint (.80), Transmit damages calculation to Tom Bruinsma for upcoming call (.10), Conference call with Tom Bruinsma, Paul Hage and Kim Clayson about status, complaint, outstanding issues and how to proceed (.70).	3.60	1,800.00
5/13/22	KRC	Meeting with trustee to discuss case status and claims.	.50	175.00
5/14/22	JGM	Address and consider revisions to draft complaint.	.30	150.00
5/16/22	JGM	Participate in conference call with Paul Neitzel and Kim Clayson about information for the complaint (.40), Follow up email to russ long about valuation of the leases (.10), Email from Paul Neitzel about congruent debt for complaint (.10), Review and revise draft adversary complaint (2.5), Address new protocols by Judge Boyd for upcoming hearing (.20), Address same with Kate Klaus (.20).	3.50	1,750.00
5/16/22	KRC	Meeting with P. Neitzel to discuss damages calculations.	.50	175.00
5/17/22	PRH	Review and revise draft insider complaint.	2.10	913.50
5/17/22	JGM	Conference call with Paul Neitzel and Kim Clayson to finalize exhibits for complaint and to address outstanding information requests (.50), Follow up call with Kim Clayson about reviewing revised complaint and various changes made thereto and confirming treatment of distributions under articles and operating agreements (multiple calls) (.50), Review pleadings in preparation for hearing on payment of insurer's fees and costs (.50).	1.00	500.00
5/17/22	KRC	Further meeting with P. Neitzel on damages.	.50	175.00
5/17/22	KRC	Attention to complaint.	2.30	805.00
5/18/22	PRH	Discuss hearing with court on insurance fees issues with J. Miller. (.2). Correspondence and call with J. Miller re complaint (.6).	.80	348.00
5/18/22	JGM	Attend hearing on motion to pay Maddin Hauser (.50), Advise Paul of results and address status of revised complaint (.20), Email to Tom Bruinsma to advise about hearing and status of complaint (.30), Review and consider proposed revisions to complaint (.50), Review and respond to email from Kim Clayson about Barfly ventures articles (.20), Review and address comments to complaint from Paul and Kim (1.0), Review and revise complaint (2.0), Review articles for Barfly ventures as relates to distributions (.20).	4.90	2,450.00
5/20/22	JGM	Address entry of order on Maddin Hauser's fees.	.20	100.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129787

Date	Atty	Description Of Services Rendered	Hours	Amount
5/23/22	JGM	Transmit order approving Maddin Hauser payment of fees to Tom Bruinsma and address status of review of complaint (.20), Advise to Russ Long about valuation issues (.10), Email to Paul Neitzel and Jim Gansman about review of complaint (.10).	.40	200.00
5/24/22	JGM	Address and respond to email from Paul Neitzel about complaint (.10), Address status of valuation with Russ Long (.10).	.20	100.00
5/25/22	JGM	Review email from Paul Neitzel about proposed revisions to the complaint (.30), Address needed revisions to complaint with Paul Neitzel (.40), Address revised complaint with Tom Bruinsma (.30), Review, revise and circulate revised complaint (1.0).	2.00	1,000.00
5/27/22	JGM	Address finalizing and filing complaint.	.40	200.00
5/30/22	PRH	Review and revise draft complaint.	1.90	826.50
5/30/22	JGM	Review comments to complaint from Paul Hage (.30), Review and revise complaint (.70), Transmit revised complaint to Paul and Kim to review (.20), Transmit revised complaint to Tom Bruinsma to review and to approve (.20).	1.40	700.00
5/31/22	JGM	Conference call with Paul Hage and Kim Clayson about complaint and various issues associated therewith (.50), Follow up call with Kim Clayson about revising exhibit b to complaint (.20), Email to Paul Neitzel about same (.10), Review and revise complaint (.60), Transmit revised complaint to Tom Bruinsma about revised complaint (.30), Follow up call with Tom Bruinsma about same (.20), Address , review and revise cover sheet for adversary complaint and filing fee (.30), Final review of complaint for filing (1.3), Address filing of complaint and acceptance of service with Kate Klaus (.10).	3.60	1,800.00
TOTAL PROFESSIONAL SERVICES				\$ 37,675.00
MATTER TOTAL				\$ 37,675.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	11.00	435.00	4,785.00
Julie A. Norton	Paralegal	1.70	250.00	425.00
Judith G. Miller	Partner	59.40	500.00	29,700.00
Kimberly Clayson	Partner	7.90	350.00	2,765.00
TOTALS		80.00		\$ 37,675.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129787

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
5/04/22 Postage expense	9.25
5/16/22 Westlaw charges	100.06
5/31/22 Filing fees -- vendor: judith miller	350.00
5/31/22 Pacer charges net charges	8.20
5/31/22 Copying/printing	138.45
5/31/22 E-discovery - storage	1,512.90
5/31/22 E-discovery - services	92.50
TOTAL COSTS ADVANCED	\$ 2,211.36
MATTER TOTAL	\$ 2,211.36

June 2022



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129789

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through June 30, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	1,251.00	.00	1,251.00
DISB	DISBURSEMENTS	.00	1,556.70	1,556.70
Total		1,251.00	1,556.70	2,807.70
TOTAL THIS INVOICE				\$ 2,807.70

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129789

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
6/01/22	JGM	Transmit complaint to Kate Klaus (.20), Confer with Todd Almassian about filing and nature of complaint against Michele Sellers (30).	.50	250.00
6/02/22	JGM	Address service of summons and complaint (.20), Address filing of appearance by Kate Klaus (.10), Confer with Kate Klaus about acceptance of service for Mark Sellers only (.20).	.50	250.00
6/24/22	PRH	Correspondence re service of complaint.	.10	43.50
6/24/22	KRC	Attention to service status on defendants, draft waiver of service and emails with Zurich counsel.	.50	175.00
6/27/22	PRH	Phone call with L. Wolf re extension of deadline to answer complaint.	.20	87.00
6/29/22	PRH	Review correspondence re extension of answer deadline.	.10	43.50
6/29/22	KRC	Attention to answer deadlines, extensions and waiver of service.	.40	140.00
6/30/22	PRH	Review answer to complaint filed by Michele Sellers.	.20	87.00
6/30/22	KRC	Received and reviewed Michele Sellers answer to complaint.	.50	175.00

TOTAL PROFESSIONAL SERVICES \$ 1,251.00

MATTER TOTAL \$ 1,251.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.60	435.00	261.00
Judith G. Miller	Partner	1.00	500.00	500.00
Kimberly Clayson	Partner	1.40	350.00	490.00
TOTALS		3.00		\$ 1,251.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129789

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
6/27/22 Copying/printing	6.75
6/30/22 E-discovery - storage	1,549.95
TOTAL COSTS ADVANCED	\$ 1,556.70
MATTER TOTAL	\$ 1,556.70

July 2022



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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129803

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through July 31, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	2,967.50	.00	2,967.50
DISB	DISBURSEMENTS	.00	1,489.50	1,489.50
Total		2,967.50	1,489.50	4,457.00

TOTAL THIS INVOICE

\$ 4,457.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129803

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
7/01/22	JGM	Address requests to extend time to respond to complaints (.30), Confer with client about same (.10), Address answer to complaint filed by Michele Sellers (.30).	.70	350.00
7/05/22	JGM	Review order submitted by Mark Gray's counsel for extension to respond to complaint (.20), Review answer filed by Michele Sellers (.50).	.70	350.00
7/06/22	JGM	Address answer to complaint and suggested mode of proceeding.	.20	100.00
7/07/22	JGM	Address answer to complaint and how to proceed (.30), Review local and federal rules governing initial status conference, initial disclosures and discovery governing case (.50).	.80	400.00
7/07/22	KRC	Attention to answer to complaint, discovery rules and status of filings.	1.00	350.00
7/11/22	JGM	Address service of Barfly management on Mark Sellers.	.10	50.00
7/14/22	JGM	Address request for complaint in word format from Mark Gray's counsel.	.20	100.00
7/15/22	PRH	Review answer to complaint filed by sellers and Barfly management.	.30	130.50
7/15/22	JGM	Address filing of answers by Mark Sellers and Barfly management (.20), Transmit same to Tom Bruinsma and address next steps (.20).	.40	200.00
7/18/22	PRH	Review gray answer to complaint.	.20	87.00
7/18/22	JGM	Transmit answer filed by Mark Gray to client (.10), Review answer filed by Mark Gray (.20), Review answer filed by Mark Sellers and Barfly management (.50).	.80	400.00
7/21/22	JGM	Address notice of Pretrial and Docket same.	.20	100.00
7/25/22	JGM	Transmit notice of first pretrial to client (.10), Address procedures and protocols of Judge Boyd (.20), Review and address email from client (.10).	.40	200.00
7/26/22	JGM	Address scheduling call with client and interoffice call to address strategy regarding prosecution of adversary proceeding.	.20	100.00
7/27/22	JGM	Address email from client about scheduling meeting and answer.	.10	50.00

TOTAL PROFESSIONAL SERVICES \$ 2,967.50

MATTER TOTAL \$ 2,967.50

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.50	435.00	217.50
Judith G. Miller	Partner	4.80	500.00	2,400.00
Kimberly Clayson	Partner	1.00	350.00	350.00
TOTALS		6.30		\$ 2,967.50

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129803

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
7/31/22 E-discovery - storage	1,433.25
7/31/22 E-discovery - services	56.25
TOTAL COSTS ADVANCED	\$ 1,489.50
MATTER TOTAL	\$ 1,489.50

August 2022



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129804

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through August 31, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	13,199.50	.00	13,199.50
DISB	DISBURSEMENTS	.00	281.63	281.63
Total		13,199.50	281.63	13,481.13
TOTAL THIS INVOICE				\$ 13,481.13

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129804

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/01/22	PRH	Attend call with J. Miller and K. Clayson to discuss strategy in insider litigation (.3). Review K. Clayson e-mail re same (.1).	.40	174.00
8/01/22	JGM	Strategy call with Paul Hage and Kim Clayson about how to proceed and initial status conference (.50), Participate in call with Tom Bruinsma and Kim Clayson about initial status conference, answers to complaint and how to proceed (.50).	1.00	500.00
8/01/22	KRC	Meeting with Paul & Judy about issues with adversary proceeding and strategy planning.	.30	105.00
8/01/22	KRC	Call with T. Bruinsma and Judy about adversary proceeding, settlement strategy and status hearing schedule.	.30	105.00
8/01/22	KRC	Reviewed answers to complaint by defendants.	1.50	525.00
8/01/22	KRC	Drafted notes on summary of answer to complaint.	.80	280.00
8/02/22	JGM	Address initial status conference with Jessie at Judge Boyd's court (multiple calls) (.20).	.20	100.00
8/04/22	JGM	Email to Kate Klaus to schedule a conference call to discuss initial status conference (.20), Exchange emails with Kate Klaus about scheduling call and initial status conference (.20).	.40	200.00
8/05/22	JGM	Advise Kate Klaus about scheduling call (.10).	.10	50.00
8/10/22	PRH	Review corrected answer and correspondence re mediation.	.20	87.00
8/10/22	LES	Review parties in Barfly cases and confirm if there are conflicts with potential mediators.	.30	70.50
8/10/22	JGM	Conference call with Kate Klaus and Kim Clayson about initial status conference, mediation, etc. (.50), Follow up call with Kim about same (.30), Email to client to address call with Kate Klaus, mediation, fraudulent conveyance claims and discovery (.50).	1.30	650.00
8/10/22	KRC	Call with Kate about pretrial conference.	.40	140.00
8/11/22	JGM	Address and consider how to proceed (.30), Address and consider same with Kim Clayson as relates to insurance issues (.30).	.60	300.00
8/11/22	KRC	Attention to discovery and correspondence with trustee and FAS about discovery, response to K. Klaus confirming as advance copy.	.40	140.00
8/14/22	EMM	Review of policy re alternative claims.	.60	204.00
8/15/22	EMM	Research re exclusions and alternative claims under insurance policy.	2.10	714.00
8/15/22	JGM	Address various issues related to adversary proceeding and initial status conference (.20), Address same and potential mediators with client (.30), Address choice of mediator with Kate Klaus (.20), Review email to Todd Almassian and Luke Wolf about initial status conference (.10).	.80	400.00
8/15/22	KRC	Correspondence with counsel for Michele Sellers and Mark Gray about mediation proposal and call request.	.30	105.00
8/16/22	JGM	Address insurance analysis and scheduling call with Luke Wolf and Todd Almassian (.20), Emails from Todd Almassian and Luke Wolf about scheduling call to address initial status conference issues (.20), Schedule call with counsel (.10).-p;	.50	250.00
8/16/22	KRC	Attention to issues in case and follow up for mediation discussion.	.30	105.00
8/17/22	EMM	Review of Insurance analysis (1.0); research re same (1.0); advise Kim Clayson and Judy Miller about same (4.0).	2.40	816.00
8/17/22	PRH	Review correspondence from e. Mayer and J. Miller re D&O coverage.	.20	87.00
8/17/22	JGM	Review email from Emily Mayer about Insurance Coverage issues.	.20	100.00
8/17/22	KRC	Attention to analysis of Insurance Coverage on intentional acts, and case pertaining to questions of intentional act coverage.	.80	280.00
8/19/22	JGM	Address and consider Insurance issues.	.30	150.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129804

Date	Atty	Description Of Services Rendered	Hours	Amount
8/22/22	JGM	Conference call with Kim Clayson and Tom Bruinsma about initial status conference, mediation and insurance issues (.50), Participate in conference call with counsel for Michele Sellers and Mark Gray about initial status conference and mediation (.50), Exchange emails (multiple emails) with Kate Klaus regarding mediation (.50), Review emails to and from Lee Silver about available mediation dates (.30).	1.80	900.00
8/22/22	KRC	Attention to adversary proceeding and status conference (.20), review of order for status conference and start on notes in preparation (.20).	.40	140.00
8/24/22	JGM	Review and provide comments to presentation for initial status conference prepared by Kim Clayson (1.0), Confer with Todd Almassian about discovery and status conference (.30), Advise Kim about same (.20).	1.50	750.00
8/24/22	KRC	Preparation for pretrial conference, review of pleadings and notes for conference.	1.00	350.00
8/25/22	JGM	Prepare for initial status conference (.50), Attend initial status conference (1.0).	1.50	750.00
8/25/22	KRC	Attend status conference in Grand Rapids.	5.00	1,750.00
8/25/22	KRC	Preparation for and attendance at initial status conference hearing on adversary proceeding.	1.20	420.00
8/25/22	KRC	Conference with Todd Almassian about claims and defenses.	.50	175.00
8/29/22	PRH	Review adversary proceeding scheduling order and correspondence re mediation.	.20	87.00
8/29/22	JGM	Address next steps with Kim Clayson (.20), Review email from Kate Klaus about mediation dates (.10), Address entry of pretrial orders and docket same (.20), Review and respond to email from Lee Silver about mediation dates (.20), Review and revise proposed email to client about initial status conference and next steps (.30).	1.00	500.00
8/29/22	KRC	Email summary to client re scheduling order.	.40	140.00
8/30/22	JGM	Address entry of orders, mediation and review and respond to emails about same (.50), Address docketing of dates (.20).	.70	350.00
8/31/22	JGM	Address, review and respond to emails about scheduling mediation (multiple emails) and docket same.	.50	250.00

TOTAL PROFESSIONAL SERVICES \$ 13,199.50

MATTER TOTAL \$ 13,199.50

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Emily M. Mayer	Partner	5.10	340.00	1,734.00
Paul R. Hage	Partner	1.00	435.00	435.00
Lauren E. Sell	Paralegal	.30	235.00	70.50
Judith G. Miller	Partner	12.40	500.00	6,200.00
Kimberly Clayson	Partner	13.60	350.00	4,760.00
TOTALS		32.40		\$ 13,199.50

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129804

RE: DISBURSEMENTS

COSTS ADVANCED

Description	Amount
8/17/22 Westlaw charges	247.88
8/24/22 Copying/printing	33.75
TOTAL COSTS ADVANCED	\$ 281.63
MATTER TOTAL	\$ 281.63

September 2022



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129805

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through September 30, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	17,682.00	.00	17,682.00
DISB	DISBURSEMENTS	.00	1,589.42	1,589.42
Total		17,682.00	1,589.42	19,271.42
TOTAL THIS INVOICE				\$ 19,271.42

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129805

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
9/03/22	JGM	Email to Paul Neitzel and Jim Gansman about discovery, scheduling a call and mediation.	.20	100.00
9/06/22	JGM	Address service of discovery and docketing same. (.20), Email to Paul Neitzel to schedule time to address discovery (.20), Follow up call with Paul Neitzel about same and attendance at mediation (.20), Email from Paul Neitzel about scheduling call (.10), Review letter and mediation agreement from Lee Silver (.30), Forward same to Tom Bruinsma and address various issues related thereto (.20), Docket date for submission of mediation summaries (.10).	1.30	650.00
9/07/22	JGM	Address request of Kate Klaus to prepay mediation fees from insurance policy (.20), Email to Tom Bruinsma about same (.20), Address scheduling of conference call with Paul Neitzel (.10), Address next steps with Kim Clayson (.20).	.70	350.00
9/07/22	KRC	Researched dales opinion on avoidance of fraudulent transfers in divorce property settlements.	1.00	350.00
9/08/22	JGM	Review, analyze and consider discovery (requests for documents and interrogatories) served by Kate Klaus (.60), Address and prepare of agenda of action items (.40), Confer with Kim Clayson about same and preparation for call with Paul Neitzel (.50), Advise to Tom Bruinsma about discovery and insurance issuance (.40), Conference call with Paul Neitzel, Kim Clayson and team to address mediation and responding to discovery (.50), Email to Kate Klaus about scheduling a call (.10), Preparation of ex parte motion and order to permit trustee to pay mediation fees (1.0), Review, revise, finalize and transmit same to client for review and approval (.20).	3.70	1,850.00
9/08/22	KRC	Attention to discovery plan and response needs (.6), Meeting with J. Miller about same (.5), Meeting with financial advisors to coordinate document production (.5), Revisions to ex parte order on payment of mediator (.3).	1.90	665.00
9/08/22	KRC	Conference call with Kate Klaus on D&O coverage issues, comfort order etc.	.40	140.00
9/08/22	KRC	Revisions to ex parte order about mediator fee.	.30	105.00
9/09/22	JGM	Address ex parte motion and order with client (.20), Address filing of same (.20), Address emails to and from Kate Klaus about call (.20), Preparation of notices of deposition for Michele Sellers and Mark Gray (1.0), Conference call with Kim Clayson and Kate Klaus about mediation fees and coverage issues (.30).	1.90	950.00
9/12/22	JGM	Review email from Kate Klaus to Jennifer Suchler about fee issues (.10), Email to Kate Klaus about comfort order for payment of mediation fees, discovery and respond to proposal (.30), Address amended answer to complaint filed by Michele Sellers (.20), Address same, notices of deposition and whether can move to strike amended answer (.30), Address and respond to email from Paul Neitzel about scheduling call to address discovery (.20).	1.10	550.00
9/13/22	JGM	Review and respond to email from David Saperstein about payment of fees (.20), Transmit same to client to address his position on same (.10), Address and consider impact of change of answer and relief available (.20), Review email to Tom Bruinsma about depositions (.10).	.60	300.00
9/13/22	KRC	Work on deposition schedule and revisions to deposition notices.	.30	105.00
9/15/22	JAN	Emails with Kim Ross-Clayson regarding process and timing for production of documents.	.30	75.00
9/15/22	JGM	Participate in conference call with Paul Neitzel, Chris Peirce and Kim Clayson about discovery and responses thereto (.50), Address research on impact of amendments to complaint (.30), Review emails from Kim and Julie about producing discovery (.20).	1.00	500.00
9/15/22	KRC	Discovery meeting with financial advisors.	.50	175.00
9/15/22	KRC	Attention to organizing discovery response and bates numbering with paralegal.	.20	70.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129805

Date	Atty	Description Of Services Rendered	Hours	Amount
9/16/22	JGM	Review and address emails concerning scheduling of depositions (multiple emails exchanged between counsel for parties) (.40).	.50	250.00
9/16/22	KRC	Scheduling depositions with counsel for M. Sellers and m. Gray and other party counsel.	.40	140.00
9/16/22	KRC	Research on relevant Caselaw in WD MI on Breach of Fiduciary duty.	1.60	560.00
9/18/22	JGM	Review and transmit order authorizing payment of mediation fees to trustee.	.20	100.00
9/19/22	JAN	Set up search for "lien" in relativity, add issue code, and emails with Kim Clayson regarding same.	.40	100.00
9/19/22	JGM	Review emails concerning scheduling of Michele Sellers' deposition (multiple emails) (.20), Review and consider email from Kim Clayson about research on breach of fiduciary duties in western district of Michigan (.20), Address emails from Kim and Julie concerning segregating discovery to respond to discovery requests (.20).	.60	300.00
9/19/22	KRC	Review of relativity documents to prepare discovery response.	2.80	980.00
9/19/22	KRC	Final revisions to deposition notice re Michele Sellers (.3). Emails with counsel regarding confirmed date (.2).	.50	175.00
9/19/22	KRC	Analysis to Judy Miller about cases found for breach of fiduciary duty.	.40	140.00
9/20/22	JGM	Review and revise notice of deposition for Michele Sellers (20), review, analyze and consider judge Gregg's decision on breach of fiduciary duties (.50).	.70	350.00
9/20/22	KRC	Attention to Mark Gray deposition scheduling.	.30	105.00
9/21/22	JGM	Address response to discovery, strategy moving forward and other issues related to litigation (.40), Email to Tom Bruinsma about mediation fees (.10), Address scheduling of next call with Paul Neitzel (.10).	.60	300.00
9/21/22	KRC	Start on response to Mark Sellers discovery request.	1.60	560.00
9/21/22	KRC	Meeting with Paul Neitzel status update on document response for Mark Sellers discovery request.	.20	70.00
9/21/22	KRC	Reviewed documents re construction liens threatened.	1.80	630.00
9/22/22	JGM	Address scheduling of Mark Gray's deposition (.20), Address filing and service of notice of deposition for Michele Sellers (.20).	.40	200.00
9/26/22	KRC	Work on discovery response.	1.20	420.00
9/27/22	JGM	Address scheduling deposition of Mark Gray deposition (.20).	.20	100.00
9/27/22	KRC	Work on discovery response.	1.20	420.00
9/27/22	KRC	Revised deposition notice of Mark Gray.	.40	140.00
9/28/22	JGM	Review and revise discovery response (1.0), Participate in conference call with Paul Neitzel, Chris Peirce and Kim Clayson about discovery response. (1.0), Follow up call with Kim about discovery response (.50), Address status and scheduling call to go over discovery responses with client (.20).	2.70	1,350.00
9/28/22	KRC	Review of discovery related documents and work on written discovery responses.	1.40	490.00
9/28/22	KRC	Call with financial advisors to review discovery response.	.80	280.00
9/29/22	JGM	Review and respond to email from David Saperstein about extending date to respond to discovery (.10), Docket new response date (.10), Review and consider email from David Saperstein about fraudulent conveyance count (.20), Conference call with David and Kim Clayson about same (.30), Follow up call with Kim about next steps, stipulation for judgment and case on fraudulent conveyances from W.D. of Michigan (.30), Follow up call with Kim and Tom Bruinsma about status, scheduling call to go over discovery and other issues related to litigation of matter (.30), Emails from Kim and Jeff about extending time to respond to sellers' discovery (.20), Address service of discovery by Michele Sellers (.20).	1.70	850.00
9/29/22	KRC	Prepared stip and order extending deadline to respond to discovery.	.40	140.00
9/30/22	PRH	Correspondence with J. Miller re subsequent transferee issue.	.20	87.00
9/30/22	JGM	Address transmittal of discovery requests with Todd and Nick (.20), Review fraudulent transfer case law as regards subsequent transferees (1.0).	1.20	600.00
9/30/22	KRC	Attend to Discovery responses.	1.60	560.00
9/30/22	KRC	Research on transferee Caselaw in WD MI.	1.00	350.00

Taft Stettinius & Hollister LLP

Client/Matter # TBC7BV/ASSETA**Invoice #: 6129805****TOTAL PROFESSIONAL SERVICES**

\$ 17,682.00

MATTER TOTAL

\$ 17,682.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.20	435.00	87.00
Julie A. Norton	Paralegal	.70	250.00	175.00
Judith G. Miller	Partner	19.30	500.00	9,650.00
Kimberly Clayson	Partner	22.20	350.00	7,770.00
TOTALS		42.40		\$ 17,682.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129805

RE: DISBURSEMENTS

COSTS ADVANCED

Description	Amount
9/09/22 Pacer charges net charges	2.10
9/30/22 Westlaw charges	121.37
9/30/22 E-discovery - storage	1,465.95
TOTAL COSTS ADVANCED	\$ 1,589.42
MATTER TOTAL	\$ 1,589.42

October 2022



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023
Invoice #: 6129807

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through October 31, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	34,582.00	.00	34,582.00
DISB	DISBURSEMENTS	.00	2,212.75	2,212.75
Total		34,582.00	2,212.75	36,794.75

TOTAL THIS INVOICE	\$ 36,794.75
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Client/Matter # TBC7BV/ASSETA

Invoice #: 6129807

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
10/03/22	JAN	Emails with Kim Clayson regarding document production due this week and extension received.	.20	50.00
10/03/22	JGM	Address email from Julie Norton about discovery responses.	.10	50.00
10/04/22	JGM	Docket new discovery response date (.10).	.10	50.00
10/04/22	KRC	Email to trustee on update with discovery requests and deadlines.	.20	70.00
10/04/22	KRC	Reviewed case on avoidance claims and email to defense counsel re the same in furtherance of settlement discussions.	.40	140.00
10/04/22	KRC	Continued work on answer to discovery by Mark Sellers.	1.40	490.00
10/05/22	PRH	Address and consider fiduciary duty claim issues.	.20	87.00
10/05/22	KRC	Review research memo about facts supporting breach of fiduciary duty claim.	.50	175.00
10/06/22	JGM	Review emails to client and Paul Neitzel about new discovery (.20), Review Michele Sellers discovery and email to Kim Clayson about same (.30), Participate in conference call with Paul Neitzel and Kim Clayson about response to discovery of Mark Sellers (.30), Review and consider email to David Saperstein about case on avoidability versus recovery (.20), Follow up call with Kim Clayson about solvency and breach of fiduciary duty issues and next steps (.30), Review and transmit email from David Saperstein to client about fees and costs incurred and request to pay from insurance (.20).	1.50	750.00
10/06/22	KRC	Call with J. Miller and p. Nietzel about insolvency analysis.	.20	70.00
10/06/22	KRC	Analyzed insolvency spreadsheet for discovery.	.40	140.00
10/07/22	PRH	Address and consider litigation issues with J. Miller and k. Clayson.	.20	87.00
10/07/22	JGM	Address solvency analysis transmitted by Paul Neitzel and address same and how to proceed with Kim Clayson (.40).	.40	200.00
10/07/22	KRC	Meeting with J. Miller and p. Nietzel to discuss insolvency analysis.	.40	140.00
10/07/22	KRC	Review and revise discovery response.	1.60	560.00
10/07/22	KRC	Review summary of legal analysis and factual allegations supporting breach of fiduciary duty over business judgment defense.	.40	140.00
10/10/22	JGM	Review, consider and respond to email from Paul Neitzel about solvency analysis (.40), Address draft valuation analysis (.30), Advise to Paul Neitzel about same (.10), Address revised discovery responses to Mark Sellers requests and solvency issues with Kim Clayson (multiple calls) (1.0), Review and revise discovery responses to Mark Sellers requests (1.2), Preparation of revised declaration (.70), Conference call with Paul Neitzel, Chris Peirce and Kim Clayson about solvency issues (.50).	4.20	2,100.00
10/10/22	KRC	Revise Michele Sellers discovery response and compiled relevant exhibits responsive to both sets of discovery.	5.20	1,820.00
10/11/22	PRH	Correspondence and conference call with J. Miller and k. Clayson regarding litigation issues.	1.40	609.00
10/11/22	JAN	Emails with Kim Clayson regarding preparing documents for production.	.30	75.00
10/11/22	JGM	Review, revise and finalize supplemental declaration of disinterestedness (.30), Transmit same to client to review and approve (.20), Strategy meeting with Paul Hage and Kim Clayson about matter and how to proceed (.70), Conference call with Paul Neitzel, Chris Peirce, and potential expert witness on solvency (.30).	1.60	800.00
10/11/22	KRC	Attention to and work on discovery responses and compilation of exhibits.	2.40	840.00
10/12/22	JGM	Address supplemental declaration with client (.20), Prepare for and participate in conference call with Kim Clayson, Paul Neitzel, Chris Peirce and Tom Bruinsma about responses to discovery and insolvency issues (1.0), Follow up call with Kim about same (.20), Address emails from Julie Norton and Kim Clayson about preparation of exhibits to responses to discovery requests (.20).	1.60	800.00
10/12/22	KRC	Call with client to review response to discovery.	1.00	350.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129807

Date	Atty	Description Of Services Rendered	Hours	Amount
10/12/22	KRC	Call with Paul Neitzel about financial management issues in Barfly.	.30	105.00
10/13/22	JAN	Emails with Kim regarding arranging a conference call regarding documents for production.	.20	50.00
10/13/22	JGM	Address filing of supplemental declaration (.20), Review and address email from dean reitberg about same (.30), Email to Dean Reitberg confirming no connections (.20), Email from Dean Reitberg about same (.10), Address scheduling meeting to mark documents to be attached to responses to sellers's discovery (.20).	1.00	500.00
10/14/22	JGM	Review and address notice of filing supplemental declaration in wrong case.	.20	100.00
10/17/22	PRH	Discuss insolvency issues with J. Miller and K. Clayson.	.50	217.50
10/17/22	JAN	Conference call with team regarding reviewing, coding, and preparing documents for production, download documents from Paul Neitzel and organize these and other documents for loading to relativity (1.0), Emails with KLD regarding adding RFP No. Coding, loading documents, and, imaging documents for production (.30), emails/calls with Kim Clayson regarding review and coding in relativity (.30).	1.60	400.00
10/17/22	JGM	Address documents attached to responses to discovery with Kim Clayson and Julie Norton (.70), Follow up call with Paul and Kim about valuation and solvency issues (.30), Follow up call with Kim, Paul and David Distel about potential engagement as expert witness (.30), Follow up call with Kim and Paul about same (.50).	1.80	900.00
10/17/22	KRC	Attention to discovery responses.	3.20	1,120.00
10/17/22	KRC	Call with J. Sorum about discovery.	.30	105.00
10/18/22	PRH	Review insolvency analysis and discuss same with K. Clayson and J. Miller.	.90	391.50
10/18/22	JAN	Vet coding decisions, code documents for confidentiality, download documents (1.7), and multiple emails/calls with Kim Clayson (.50).	2.20	550.00
10/18/22	JGM	Address documents to be produced with Paul Hage (.30), Address same with Kim Clayson (multiple calls) about same (1.5), Address engagement as expert witness with David Distel (.20), Emails to and from David Distel regarding engagement (.30).	2.30	1,150.00
10/18/22	KRC	Work on finalizing document production for response to discovery.	3.20	1,120.00
10/19/22	JGM	Review and revise proposed engagement letter from David Distel (.50), Address same with David Distel (.20), Review preliminary a/p aging summary prepared by Paul Neitzel (.30), Participate in conference call with Paul Neitzel, Chris Peirce, Kim Clayson and client about preliminary summary analysis, document production and response to sellers' discovery (.40), Final review of responses for Mark Sellers' discovery (1.0), Confer with Kim about same (multiple calls) (.70),, Email to client about discovery (.10), Address emails about documents to be produced with kim and emails in connection therewith (.40), Follow up call with Paul Neitzel about same (.10).	3.70	1,850.00
10/19/22	KRC	Work on completion of revisions to discovery request including document submission.	1.80	630.00
10/20/22	JAN	Download production from KLD's ftp site, export and format report of bates numbers from relativity, prepare production for producing to opposing counsel, and emails with KLD and Kim Clayson regarding same.	.70	175.00
10/20/22	JGM	Address finalizing and serving of discovery responses (.40), Final review of responses (.30), Address filing requirements in western district for discovery responses (.30), Address documents to be obtained from Michele Sellers (.20), Review emails to and from Kim Clayson and Todd Almassian about production of documents by Michele Sellers (.30), Address final discovery responses with Tom Bruinsma (.20), Email confirmation from tom about same (.10), Email from Julie Norton about bates stamped documents (.10).	1.70	850.00
10/20/22	KRC	Preparation of document submission and discovery response for delivery to counsel.	1.40	490.00
10/21/22	JGM	Review and consider correspondence from David Saperstein.	.30	150.00
10/24/22	JGM	Address discovery issues (.50), Address and consider letter from David Saperstein (.10), Address scheduling meeting with Jeff Sorcum (.20).	.80	400.00
10/24/22	KRC	Attention to Michele Sellers discovery request and response.	3.40	1,190.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129807

Date	Atty	Description Of Services Rendered	Hours	Amount
10/25/22	JGM	Address email from Paul Neitzel regarding discovery (.20), Address status of discovery, extending time to respond to Michele Sellers discovery and scheduling call with Paul Neitzel with Kim Clayson (.30), Docket new response date for discovery (.10), Address emails regarding extension of response date (.10), Email to client to address final discovery responses, review of new discovery responses and letter from David Saperstein (.20), Address scheduling of call with client to review responses to Michele Sellers' discovery (.20), Preparation of outline for Michele Sellers' deposition (.80), Review and revise responses to Michele Sellers' discovery requests (1.8).	3.70	1,850.00
10/25/22	KRC	Work on final discovery draft for Michele Sellers discovery request.	3.40	1,190.00
10/25/22	KRC	Work on examination preparation for Michele Sellers deposition.	1.00	350.00
10/25/22	KRC	Prepared stip and order to extend discovery response and corresponded with Todd Almassian about the same.	.40	140.00
10/26/22	JGM	Continue review and revision of discovery responses (.30), Call with Kim to address needed revisions to discovery responses and how to proceed (1.2), Address transfers with Paul Neitzel (.10), Follow up call with Kim about initial scheduling order and limitations under federal rules (.20), Address entry of order extending time to respond to Michele Sellers' discovery and email same to client (.20).	2.00	1,000.00
10/26/22	KRC	Draft edits to discovery response.	6.00	2,100.00
10/27/22	JGM	Review email from Kim Clayson about responses to Michele Sellers discovery and federal rule limiting number of interrogatories (.20), Follow up call with Kim about same and next steps (.30), Review and revise draft response to Michele Sellers discovery (1.5).	2.00	1,000.00
10/27/22	KRC	Edits to response to Michele Sellers discovery.	2.80	980.00
10/28/22	JGM	Address rescheduling call with Paul Neitzel and emails in connection therewith (.20), Address discovery and action to be taken (40).	.60	300.00
10/28/22	KRC	Attention to discovery edits with email to trustee with draft discovery.	.40	140.00
10/31/22	JAN	Emails with Kim Clayson-ross regarding additional sellers' exam exhibits to produce, run search of exam exhibits and review coding decisions, and send those coded as not responsive for Kim to review.	.50	125.00
10/31/22	JGM	Conference call with Paul Nietzel, Chris Peirce, Jim Gansman and Kim Clayson about responses to Michele Sellers' discovery, call with Jeff Sorcum, and preparation for Michele Seller's deposition (.50), Review follow up emails from Paul, Chirs and Kim about responses to discovery and transfers made to Michele (multiple emails),(.50), Follow-up call with Kim Clayson about revisions to responses to discovery and review of Mark Sellers' 2004 exam transcript in connection therewith (.30), Conference call with Tom Bruinsma and Kim Clayson about responses to Michele Sellers' discovery (.40), Address revising exhibit showing transfers to address new information from Chris with Paul Neitzel (.20), review email from Kim to Tom with revisions to responses to discovery (.20), Follow up calls with Paul Neitzel (multiple calls) about transfers (.40), Advise Kim of same (.10).	2.50	1,250.00
10/31/22	KRC	Meeting with financial advisors on deposition prep.	.50	175.00
10/31/22	KRC	Attention to revisions to discovery for submission to Michele Sellers.	2.20	770.00
10/31/22	KRC	Preparation of notes and edits to Michele Sellers' deposition outline.	.50	175.00
TOTAL PROFESSIONAL SERVICES				\$ 34,582.00
MATTER TOTAL				\$ 34,582.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129807

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	3.20	435.00	1,392.00
Julie A. Norton	Paralegal	5.70	250.00	1,425.00
Judith G. Miller	Partner	32.10	500.00	16,050.00
Kimberly Clayson	Partner	44.90	350.00	15,715.00
TOTALS		85.90		\$ 34,582.00

Client/Matter # TBC7BV/DISB**Invoice #: 6129807****RE: DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
10/20/22 Copying/printing	5.85
10/31/22 E-discovery - storage	1,514.40
10/31/22 E-discovery - services	692.50
TOTAL COSTS ADVANCED	\$ 2,212.75
MATTER TOTAL	\$ 2,212.75

November 2022

Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

Tel: 248.351.3000 / Fax: 248.351.3082

www.taftlaw.com

FEIN#: 31-0541755

September 11, 2023
Invoice #: 6129808

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through November 30, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	49,871.00	.00	49,871.00
DISB	DISBURSEMENTS	.00	1,951.97	1,951.97
Total		49,871.00	1,951.97	51,822.97
TOTAL THIS INVOICE				\$ 51,822.97

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129808

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
11/01/22	JAN	Emails with Kim Clayson confirming that we are producing additional exam exhibits, update coding decisions, and emails with KLD regarding running a supplemental production; download production and forward to Kim to send to opposing counsel.	.90	225.00
11/01/22	JGM	Participate in conference call with Paul Neitzel, Kim Clayson and Jeff Sorum, (1.8), Follow up call with Kim about same and next steps (.10) Follow up call with Paul about same (.10), Review email to client about revision to discovery responses (.10), Review emails about bate stamping of documents for discovery responses (.10), Address reaching out to Todd Kronebush (.10), Address approval of responses by client (.10).	2.40	1,200.00
11/01/22	KRC	Attend Zoom call with Jeff Sorum.	2.00	700.00
11/01/22	KRC	Compiled notes from Jeff Sorum zoom call.	1.40	490.00
11/01/22	KRC	Final attention to discovery response.	1.00	350.00
11/01/22	KRC	Prepare for call with Jeff Sorum.	.40	140.00
11/02/22	JGM	Address next steps with Paul Hage (.20), Review notes from meeting with Jeff Sorum (1.0), Address preparing affidavit to preserve testimony (.20), Review emails about finalizing and serving discovery (.20), Address service of documents by Michele Sellers and emails in connection therewith (.40).	1.00	500.00
11/02/22	KRC	Attention to submitting discovery.	.30	105.00
11/02/22	KRC	Review of documents submitted for deposition of Michele Sellers.	1.50	525.00
11/02/22	KRC	Work on outline for Michele Sellers deposition.	1.00	350.00
11/03/22	PRH	Review correspondence from J. Miller re litigation issues.	.40	174.00
11/03/22	JGM	Address email from David Saperstein about fees incurred and authority to pay (.10), Email Tom Bruinsma about same (.10), Transmit response to subpoena to client (.20), Review response/objection to subpoena to Michele Sellers (.30), Address additional documents needed (.20), Address scheduling call to Todd Kronebush (.20), Review and respond to email from David Distel about revised engagement letter (.20),Review email to Nick and Todd about missing documents (.20), Email to client to address same and other current actions being taken (.30), Review revised engagement letter from David Distel (.60),Email to David Distel about same (.20), Email to and from Dave with revised engagement letter (.10), Email to tom about review, approval and execution of engagement letter (.10), Review and consider objections to documents produced by Michele Sellers and response of Todd Almassian and action to be taken (.30), Complete review and revision of notes from call with Jeff Sorum (.80), Address email from Todd Kronebush (.20).	4.10	2,050.00
11/03/22	KRC	Work on deposition preparation.	1.60	560.00
11/03/22	KRC	Call with Todd Almassian to resolve discovery issues and draft summary of call.	.50	175.00
11/03/22	KRC	Call with T. Kronebush and follow up emails to discuss Barfly matter.	.30	105.00
11/04/22	JGM	Address transmittal of final executed engagement letter to client and Dave Distel (.20), Email from Dave Distel about same (.10), Address scheduling of conference call with Todd Kronebush (.10).	.40	200.00
11/04/22	KRC	Worked on discovery and deposition preparations.	2.40	840.00
11/07/22	JGM	Review email from Nick Laue about production of documents (.20), Review documents produced (.20).	.40	200.00
11/08/22	JGM	Email to Tom Bruinsma about interview with Jeff Sorum and other matters (.30), Email to Paul Neitzel about interview of Jeff Sorum (.10).	.40	200.00
11/08/22	KRC	Received and read over request for concurrence related to amendments to affirmative defenses.	.40	140.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129808

Date	Atty	Description Of Services Rendered	Hours	Amount
11/09/22	JGM	Interview of Todd Kronebush (2.0), Conference call with Paul Neitzel and Kim Clayson about preparation for deposition of Michele Sellers (1.5), Address proposed amended affirmative defenses asserted by Mark Sellers and Barfly management (.30), Exchange emails with David Saperstein about same (.20), Review federal rule of bankruptcy procedure 7015 (.40), Email Tom Bruinsma about proposed amended affirmative defenses and request by defendants to stipulate to filing of same (.60), Address relief requested with Paul Hage (.20), Address same with Chris Cataldo (.20), Address meeting with Dave Distel after sellers' deposition (.20), Address potential conflict with court appearance and deposition with Todd Almassian and Kim Clayson (.10), Review emails about exchange of exhibits for deposition (.10).	5.50	2,750.00
11/09/22	KRC	Preparation for deposition.	4.00	1,400.00
11/09/22	KRC	Travel to Michele Sellers' Deposition in Grand Rapids.	2.00	700.00
11/10/22	JGM	Address deposition with Kim Clayson (.20), Attend deposition of Michele Sellers (3.5), Address proposed stip with David Saperstein (.20), Review follow up emails from Kim and Todd after Deposition (.20), Meeting with Paul Neitzel, Chris Peirce, David Distel and Kim Clayson (1.5), Advise to Tom Bruinsma about proposed stip (.10), Email from David Distel about scheduling follow-up call (.10).	5.80	2,900.00
11/10/22	KRC	Attend Deposition of Michele Sellers.	3.50	1,225.00
11/10/22	KRC	Meeting with FAS and financial expert for review of insolvency.	1.40	490.00
11/11/22	LES	Pull docket for divorce proceeding for Mark Sellers and Michele Sellers.	.20	47.00
11/11/22	JGM	Call with Tom Bruinsma and Kim Clayson about proposed amended affirmative defenses and action to be taken thereon (.40), Review emails from Kim and Todd Almassian about further email searches, waiving signing of deposition, and tax returns (.20), Direct Lauren sells to review of Kent County Divorce Docket for Mark and Michele Sellers (.20), Consider proposed terms for email search by Michele Sellers (.30), Follow up emails with Paul Neitzell and Dave Distel about scheduling follow up call (.10), Review divorce docket (.10).	1.30	650.00
11/11/22	KRC	Post deposition document follow up with defendants' counsel and request for production of documents.	.60	210.00
11/11/22	KRC	Call with client as update about adversary proceeding.	.30	105.00
11/13/22	KRC	Travel from Michele Sellers' deposition to Detroit.	2.00	700.00
11/14/22	JGM	Calls with Tom Bruinsma about request to amend affirmative defenses by David Saperstein and action to be taken (multiple calls) (.30), Call with David Saperstein about reasons for proposed amendments (.20), Advise Kim about same and how we intend to proceed (multiple emails) (.30). Address preparation of affidavit for Jeff Sorum (1.0).	1.80	900.00
11/14/22	KRC	Address and consider how to respond to amended affirmative defenses by Mark Sellers' counsel.	.20	70.00
11/15/22	JAN	Review proposed search terms for Michele Sellers emails and provide comments.	.40	100.00
11/15/22	JGM	Address request to amend Affiramtive defenses with David Saperstein (.20), Follow up call with Tom Bruinsma about same (.20), Email red-lined version of affirmative defenses to David Saperstein along with proposed terms of stipulation (.30), Review and address email from Dave Distel about document list (.10), Advise to and from Paul Neitzel about same (.20), Address search terms for Michele Sellers (.40), Work on affidavit for Jeff Sorum (2.5), Exchange emails with Julie Norton about same (.20).	4.00	2,000.00
11/16/22	JAN	Search relativity for emails addresses, draft list of search terms (1.0), and emails/call with Judy Miller regarding same (.20).	1.20	300.00
11/16/22	JGM	Complete, review and revise affidavit of Jeff Sorum (4.0), Review and address email from Julie Norton about search terms (.30), Email to Todd Almassian about search terms, documents and next steps to complete Michel Sellers deposition (.50), Email from and to David Distel about access to documents (.10).	4.90	2,450.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129808

Date	Atty	Description Of Services Rendered	Hours	Amount
11/17/22	JGM	Review and respond to email from Todd Almassian about documents and searches (.20), Address revised affidavit of Jeff Sorum and how to proceed (.60), Address review of Barfly email box of Michele Sellers based on new search terms and email to Julie Norton about same (.20).	1.00	500.00
11/17/22	KRC	Work on revisions to Jeff Sorum affidavit.	3.50	1,225.00
11/18/22	JAN	Emails with KLD regarding various historical searches/promotions, update tracking log (1.0), and detailed email to Kim Clayson and Judy Miller regarding same as well as search options (.50), telephone call with Judy Miller regarding search terms to opposing counsel and collection of Michele Sellers' Barfly emails (.30).	1.80	450.00
11/18/22	JGM	Review, revise and finalize J. Sorum affidavit and transmit same to Kim Clayson to review and to approve (1.0), Address same with Jeff Sorum (.20), Email to Jeff Sorum about review of affidavit (.30), Review and consider response from Jeff Sorum about same (.20), Multiple emails from Todd Almassian about production of documents and NDA (.60), Review NDA transmitted by Todd (.50), Email to David Saperstein and Todd Almassian about NDA and protective order (.20), Review bankruptcy code and bankruptcy rules regarding protective orders and sealing record (.50), Address email from David Saperstein about scheduling call to address protective order (.20), Address search terms and address email searches for Michele Sellers with Julie Norton (.30), Exchange emails with Julie about same (.20), Review email from Paul Neitzel about preparation for gray deposition (.10).	4.30	2,150.00
11/18/22	KRC	Prepare T. Kronebush interview notes.	1.00	350.00
11/20/22	KRC	Mark Gray deposition prep.	3.20	1,120.00
11/21/22	JAN	Emails with client and KLD regarding arranging for collection of Michele Sellers' emails, run production search and send link to Kim Clayson.	.50	125.00
11/21/22	JGM	Address scheduling call to discuss protective order and emails in connection therewith (.40), Review and revise outline for deposition of Mark Gray and transmit to Kim Clayson (1.5), Participate in conference call with Kim Clayson and Paul Neitzel to prepare for deposition of Mark Gray (1.0), Exchange emails with David Saperstein (multiple emails) about proposed protective order (.40), Follow up call with David about same (.20), Review and respond to email from David to Todd about consent to produce documents subject to confidentiality (.20), Preparation of proposed protective order and stipulation for entry of same (2.0), Transmit same to Tom Bruinsma to review and to approve (.20).	5.90	2,950.00
11/21/22	KRC	Prep call for deposition of Mark Gray.	1.00	350.00
11/21/22	KRC	Work on document review and preparation for Mark Gray deposition.	3.60	1,260.00
11/22/22	JAN	Download/organize productions by Michele Sellers and Mark Gray, and forward to Paul Neitzel (.40); telephone call with the team regarding next steps and emails with Abel and KLD regarding collection of Michele Sellers' emails (.40).	.80	200.00
11/22/22	JGM	Address email from Luke Wolf with production of documents and response to notice of deposition (.40), Address whether to proceed with deposition with Kim Clayson in light of late production (multiple calls) (.50), Address email from Todd Almassian with additional documents (20), direct Julie Norton to download newly produced documents (.20), Follow up call with Kim and Julie about same (.20), Attend deposition of Mark Gray in order to adjourn same (.50), Address deposition of lender with David Saperstein and Kim Clayson (.30), Address follow up action to be taken with Paul Neitzel and Kim Clayson (.20), Address transmittal of Mark Sellers deposition transcript and exhibits to David Distel (.10), Address preparation of Additional Notice to Produce and documents subject thereto for Mark Sellers with Kim (.20), Review, revise and circulate protective order to counsel for defendants (1.0), Address status with Tom Bruinsma and action to be taken in connection with gray deposition, additional discovery and protective order (.30), Review emails from Julie Norton about accessing Michele Sellers' emails (.20), Confer with Todd Almassian about discovery issues, protective order and potential settlement offer (.40).	4.70	2,350.00
11/22/22	KRC	Received and reviewed documents produced by Mark Gray.	2.00	700.00
11/22/22	KRC	Appearance for Mark Gray deposition and adjournment of same.	.80	280.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129808

Date	Atty	Description Of Services Rendered	Hours	Amount
11/22/22	KRC	Reviewed draft protective order and edits to the same.	1.00	350.00
11/23/22	JAN	Search relativity for additional email domains, review documents produced by Mark Gray for additional email domain information (.16), emails/call with Judy Miller regarding search terms for Michele Sellers' emails (.30), and draft email to opposing counsel with revised search terms (.30).	2.20	550.00
11/23/22	JGM	Review and address emails from Julie Norton about e-discovery (.30), Follow up call with Julie about same (.20), Review email from Todd Almassian about discovery issues and search terms (.20), Address email from David Distel (.10), Address follow up email from Kim (.10).	.90	450.00
11/25/22	KRC	Drafted request for production of documents to Mark Sellers.	1.00	350.00
11/28/22	JGM	Review and revise first request for production of documents by Mark Sellers (2.0), Review schedules and statement of financial affairs of Mark Sellers (.40), Review deposition transcript of Mark Sellers (.30), Address request with Kim Clayson (.50), Review and respond to email from David Saperstein about confidential documents and protective order (.20), Review and consider follow up email from David Saperstein about protective order (.30), Review email to Paul Neitzel about discovery request (.10), Review and revise protective order (.50).	4.00	2,000.00
11/28/22	KRC	Attention to request for production of documents.	.50	175.00
11/29/22	JAN	Emails with counsel for Michele Sellers and Judy Miller regarding email search status.	.20	50.00
11/29/22	JGM	Address proposed revisions to protective order and email from David Saperstein about same (.10), Review proposed revised protective order and email from David Saperstein about same (.30), Transmit revised protective order to client to review and to approve (.20), Email to David Saperstein to advise about action to be taken on protective order (.10), Review, consider and address email from David Saperstein regarding amending affirmative defenses and dismissal of Barfly management (1.0), Exchange emails with David Saperstein about same (.10), Review and respond to email from David Distel about preparation for and adjourning meeting (.20).	1.90	950.00
11/29/22	KRC	Reviewed protective order draft for final edits and correspondence about the same.	.60	210.00
11/29/22	KRC	Attention to affirmative defenses and issues with Barfly management claims.	.80	280.00
11/29/22	KRC	Review of gray document production and further preparation for deposition.	3.20	1,120.00
11/30/22	JAN	Emails with KLD and Abel regarding status of email collection.	.20	50.00
11/30/22	JGM	Address proposed amendment and dismissal request from David Saperstein (.50), Participate in conference call with Kim Clayson, David Distel and Paul Neitzel about preparation for gray deposition and dealings with Jeff Sorum affidavit (.50), Follow up call with David Distel about scope of engagement (.20), Preparation of affidavit of Todd Kronebusch (1.5), Confer with Tom Bruinsma about new issues that have been raised by David Saperstein and scheduling call to address same (.20), Transmit email and draft documents from David to tom (.20), Review emails regarding Ediscovery issues (.30).	3.40	1,700.00
11/30/22	KRC	Deposition preparation.	4.00	1,400.00

TOTAL PROFESSIONAL SERVICES

\$ 49,871.00

MATTER TOTAL

\$ 49,871.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129808

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Paul R. Hage	Partner	.40	435.00	174.00
Julie A. Norton	Paralegal	8.20	250.00	2,050.00
Lauren E. Sell	Paralegal	.20	235.00	47.00
Judith G. Miller	Partner	58.10	500.00	29,050.00
Kimberly Clayson	Partner	53.00	350.00	18,550.00
TOTALS		119.90		\$ 49,871.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129808

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
11/02/22 Postage expense	7.92
11/21/22 Copying/printing	13.80
11/30/22 E-discovery - storage	1,437.75
11/30/22 E-discovery - services	492.50
TOTAL COSTS ADVANCED	\$ 1,951.97
MATTER TOTAL	\$ 1,951.97

December 2022



Taft Stettinius & Hollister LLP
 27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214
 Tel: 248.351.3000 / Fax: 248.351.3082
www.taftlaw.com
 FEIN#: 31-0541755

September 11, 2023
 Invoice #: 6129809

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through December 31, 2022:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	54,518.00	.00	54,518.00
DISB	DISBURSEMENTS	.00	6,033.13	6,033.13
EMP	EMPLOYMENT	355.00	.00	355.00
Total		54,873.00	6,033.13	60,906.13
TOTAL THIS INVOICE				\$ 60,906.13

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129809

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
12/01/22	JAN	Telephone call with Kim Clayson regarding production of ESI.	.30	75.00
12/01/22	JGM	Address preparation for Mark Gray deposition (.50), Review, revise and transmit revised outline to Kim (1.0), Conference call with Tom Bruinsma and Kim Clayson about discovery, affirmative defenses, dismissal request and other issues and status of matter (1.0), Confirmatory email to client about action to be taken (.50), Review, revise and finalize protective order and stipulation and circulate to parties to review and to approve (.30), Email to Luke Wolf about stipulation and order on payment of fees (.20), Email to Paul Neitzel about discovery request to Sellers (.10), Follow up call with Paul about same (.10), Review email from Paul about changes needed to discovery request (.10), Address and direct same with Kim (.10), Address and prepare proposed email to David Saperstein about request to dismiss Barfly Management (.70), Vet email and receive comments from Paul and Kim about same (.30), Review, revise and finalize email and transmit to David Saperstein (.30), Review and respond to email from David Saperstein about demand to respond to request to dismiss Barfly Management (.40), Transmit same to Tom Bruinsma and advise about same (.30), Work on affidavit of Todd Kronebusch (.30).	6.20	3,100.00
12/01/22	KRC	Preparation for Mark Gray deposition.	6.00	2,100.00
12/02/22	JGM	Attend deposition of Mark Gray (5.5), Preparation of email to David Saperstein about request to amend affirmative defenses and alleged conflict of interest (.40), Follow up call with Kim Clayson about next steps (.30), Email to and from Todd Almassian about adjourned deposition date (.20), Review and address email about affirmative defenses and conflict issue with David Saperstein (.20), alleged review and consider email from David Distel about questions for deposition (.20).	6.80	3,400.00
12/02/22	KRC	Deposition of Mark Gray and related preparation.	8.00	2,800.00
12/05/22	JAN	Review/review search terms for opposing counsel's searches of Mark Gray emails and emails with Judy Miller and Kim Clayson regarding same (.40); emails with KLD regarding issues with collection of Michele Sellers' emails (.46).	.80	200.00
12/05/22	JGM	Review emails from David Distel, Chris Peirce and Paul Neitzel about issues and documents for completing financial review (multiple emails) (.50), Participate in conference call with Chris Peirce, Paul Neitzel and David Distel about review of documents, preliminary analysis, additional documents and information needed and scheduling next call with client (1.0), Follow up call with client to address status and how to proceed (.30), Review email and proposed stipulation and order from Luke Wolf on payment of fees (.30), Review and revise stipulation and order and transmit to Luke Wolf to review and to approve (.50), Address discovery with Luke Wolf (.20), Preparation of search terms for eDiscovery by Mark Gray (.30), Transmit same to Julie Norton to review and to address (.10), Address emails about additional e-discovery from Barfly (multiple emails) (.30).	3.50	1,750.00
12/06/22	JAN	Search relativity for email addresses, emails with Paul Neitzel regarding email address (.20), revise search term list to send to opposing counsel (.50), draft email to opposing counsel (1.0), and emails/call with Judy Miller regarding same; emails with KLD regarding Michele Sellers' Barfly email collection issues (.30).	1.70	425.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129809

Date	Atty	Description Of Services Rendered	Hours	Amount
12/06/22	JGM	Address, consider and respond to email from David Saperstein about waiver of alleged conflict issue and stipulating to amend affirmative defenses (.50), Address and consider emails from David Distel about status of fees and potential conflict issue (multiple emails) (.30), Confer with Dave about same (.20), Review emails from David, Chris and Paul about additional documents and information needed for analysis of solvency (multiple emails (.50), Email to Chris and Paul to secure entire loan file from lenders (.10), Email to Julie Norton to address additional eDiscovery (.10), Address redocketing of Gray adjourned deposition (.20), Address email from David Saperstein about current monthly fees (.10), Transmit same to Tom Bruinsma for consideration (.10), Address outstanding fees and handling of same with Paul Hage (.20), Address and respond to email from Julie Norton (multiple emails) about search terms and eDiscovery from Mark Gray (.50), Review and revise proposed email to be sent to Luke Wolf (.20), Review search terms (.20).	3.20	1,600.00
12/07/22	JGM	Address and consider amendment of affirmative defenses and options and discuss same with David Saperstein (.30), Advise client about same and issues raised by David Distel (.20), Advise David Distel of same (.10), Docket adjourned deposition date for Mark Gray and address scheduling of court reporter via zoom and providing of exhibits (.30).	.90	450.00
12/08/22	JAN	Emails with KLD and Judy Miller regarding collection of Michele Sellers' Barfly emails and searches to conduct.	.40	100.00
12/08/22	JGM	Review and consider email from Judge Boyd about protective order (.30), (.10), Address how to respond with David Saperstein (.10), Advise client about letter from Judge Boyd and how we intend to proceed (.30), Review and docket notice of hearing on protective order (.20), Email to David Saperstein to confirm action to be taken on protective order (.20), Email client about confirmation of no conflict and fees with David Distel (.20), Email to David Distel about confirming no conflict and billing (.20), Review, consider and respond to email from Dean Reitberg about protective order (.30), Review email from David Saperstein to Dean Reitberg (.10), Email to Paul Neitzel to address status of Sorum affidavit (.10), Email from and to Dean Reitberg about supplemental language to be included in protective order (.20), Email to client about supplemental language requested by Dean Reitberg in protective order (.10), Email from and to Julie Norton about eDiscovery with Michele Sellers (.20), Work on affidavit for Todd Kronebusch (2.0), Review and respond to David Saperstein's email and provide order and revised language for protective order (.50), Transmit proposed Kronebusch affidavit to Kim to review and to approve (.10).	5.20	2,600.00
12/08/22	KRC	Received and reviewed court letter regarding protective order terms.	.10	35.00
12/08/22	KRC	Attention to protective order correspondence, expert witness correspondence, insurance counsel payments correspondence.	.60	210.00
12/09/22	JAN	Telephone conference with Judy Miller and Kim Clayson regarding search terms for Michele Sellers' emails, draft search criteria, multiple emails seeking clarification, submit search requests to KLD, and update search tracking log.	1.70	425.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129809

Date	Atty	Description Of Services Rendered	Hours	Amount
12/09/22	JGM	Address eDiscovery for Michele Sellers (.30), address delivery status and next steps (.20), Review follow up emails about eDiscovery (.80), Address stipulation and order on fees and eDiscovery with Luke Wolf (.20), Review email from Julie Norton to Luke Wolf (.10), Follow up email from Luke Wolf about same (.10), Review emails from David Saperstein about revised protective order and review of revised protective order (.30), Review and revise protective order (.30), Review and revise stipulation for entry of revised protective order (1.0), Transmit revised pleadings to all counsel to review and to approve (.30), Email from David Saperstein about amended affirmative defenses (.20), Address same with Kim Clayson and client (.20), Review and respond to email from Dean Reitberg about stipulation and protective order (.20), Review and revise signature block for stipulation (.10), Email from Kim about proposed request by David Saperstein about affirmative defenses (.10), Address same with Tom Bruinsma and confirm confirmation to David Saperstein (.10), Review and respond to email from David Saperstein about approval of stipulation for amended protective order (.10), Email from and to Luke Wolf about approval of stipulation (.10) Follow up email from Dean Reitberg about change to signature block in stipulation and address same (.20), Address Sorum declaration with Jeff Sorum and Paul Neitzel (.70), Review and revise same and transmit to Paul Neitzel to send to Jeff Sorum (.30), Review and transmit letter with notice of deposition of Travis Baldwin to client (.30), Review revision to Kronebusch affidavit (.20), Transmit revised Kronebusch affidavit to Paul Neitzel to send to Todd Kronebusch (.20), Email from Paul Neitzel about submittal of Sorum affidavit (.10).	6.40	3,200.00
12/09/22	KRC	Conference with J. Miller and J. Norton to discuss email searches for discovery, Mark Gray discovery status and mediation preparation.	.40	140.00
12/09/22	KRC	Review and revised Todd Kronebusch affidavit.	.80	280.00
12/10/22	JGM	Emails from Todd Almassian about approval of amended protective order and status of eDiscovery.	.20	100.00
12/12/22	JGM	Address and handle filing of stipulation for entry of amended protective order (.30), Advise Shelley at Judge Boyd's chambers about filing of same (.20), Email to Paul Neitzel about outstanding deliverables (.30), Email from Julie Norton out e-discovery issues with Michele Sellers' Barfly account (.10), Docket deposition of Travis Baldwin (.10), Address discovery request by David Saperstein and status (.20), Review list of documents sought from Travis Baldwin (.20), Email to David Saperstein about notice of deposition (.20), Email from David Saperstein about deposition (.10), Email from Paul Neitzel about tasks and status (.10), Email from and to Paul Neitzel about scheduling call with Plante Moran (.10), Email from David Distel about same (.10), Email from and to Luke Wolf about scheduling a call to address eDiscovery (.10), Address scheduling issues and email from Kim Clayson about same (.20), Address eDiscovery and deposition issues with Luke and Kim and status of uploading stipulation and order on fees (.20), Address receipt of Gray transcript and exhibits (.20), Email to David Saperstein about scheduling of depositions (.20).	2.90	1,450.00
12/12/22	KRC	Attention to discovery, subpoena, protective order, opposing counsel correspondence.	1.00	350.00
12/12/22	KRC	Call with Mark Gray counsel about discovery issues.	.50	175.00
12/13/22	JAN	Emails with Abel and KLD regarding Michele Sellers' email collections/searches.	.30	75.00
12/13/22	JGM	Review emails about eDiscovery of Michele Sellers' Barfly mailbox (.20), Address filing of stipulation on payment of fees by Luke Wolf (.10), Address email from Julie about Gray transcript and exhibits and emails from Tina about court reporter fees (.10).	.40	200.00
12/13/22	KRC	Received and reviewed emails pertaining to discovery among parties.	.30	105.00
12/14/22	JAN	Review initial search hit report and multiple emails with KLD with questions and requesting clarifications.	1.20	300.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129809

Date	Atty	Description Of Services Rendered	Hours	Amount
12/14/22	JGM	Review and respond to emails from Paul Neitzel about Kronebusch affidavit, Sorum declaration and getting documents from Travis Baldwin (.40), Review and revise Sorum declaration based on edits requested by him (.30), Transmit revised declaration to Paul Neitzel to forward to Jeff Sorum for review, approval and execution (.20), Review and respond to email from Chris Peirce about summary analyses (.20), Address payment of court reporter fees (.10), Participate in conference call with Dave Distel, Paul Neitzel, Chris Peirce and Jeff Bailey about obtaining work papers from Plante Moran (.60), Follow up call with Paul, Chris and Dave about same (.20), Review email to Jeff Bailey about additional documents sought (.20), Email to Dave Distel about same (.10), Address entry of protective order (.10), Email to client about entry of protective order and preparation for Friday call (.20), Email from Kim to Luke about status of eDiscovery (.10).	2.60	1,300.00
12/14/22	KRC	Received and read emails about financial analysis.	.30	105.00
12/14/22	KRC	Received and reviewed email to client with protective order, reviewed entered protective order.	.20	70.00
12/14/22	KRC	Follow up email to M. Gray's counsel about status of email production.	.10	35.00
12/15/22	JAN	Review search results, note discrepancies, and multiple emails with KLD regarding same.	.70	175.00
12/15/22	JGM	Address email from Luke Wolf about eDiscovery (.10), Call with Luke Wolf and Kim Clayson about eDiscovery, deposition and next steps (.20), Confirm no hearing on December 20th with Shelley, Judge Boyd's clerk (.10), Email to counsel to confirm same (.20), Confer with Todd Almassian about status of eDiscovery and reschedule Michele Sellers' deposition (.20), Confirmatory email to Todd and all counsel about same (.20), Email to Paul Neitzel about deposition schedule (.20).	1.20	600.00
12/15/22	KRC	Received and reviewed email from L. Wolf re status of email search for M. Gray and sent response.	.20	70.00
12/15/22	KRC	Attention to email search results for Mark Gray and status of the same and phone calls with Mark Gray counsel.	.50	175.00
12/15/22	KRC	Received and reviewed emails re status of court hearing on protective order, and discovery status as to Michele Sellers email results.	.30	105.00
12/16/22	JAN	Review search reports and multiple emails with KLD regarding same (.50); emails with Judy Miller and Kim Clayson regarding searches (.20), locating additional email account for Michele Sellers, and updating document review searches (1.0).	1.70	425.00
12/16/22	JGM	Address email from Jeff Bailey about production of Plante Moran documents and work papers (.20), Follow up conversation about same with Jeff (.20), Email Jeff with protective order (.20), Advise David Distel about same (.10), Address eDiscovery of Michele Sellers mailbox (multiple emails) with Julie Norton and Kim Clayson (.70), Transmit order permitting payment of wolf's fees to client (.20), Review and respond to email from Todd Almassian about status of eDiscovery (.10), Email to Todd Almassian about additional search term for eDiscovery (.20), Review notice of cancellation of hearing (.10), Conference call with Paul, Chris, Dave, Kim and client to go over preliminary summary solvency analyses (.70), Review and respond to email from Nick about eDiscovery (.10), Address letter from David Saperstein about discovery issues (.20).	3.00	1,500.00
12/16/22	KRC	Received and read over discovery letter from D. Saperstein.	.50	175.00
12/16/22	KRC	Preparation of on outline notes for mediation.	.50	175.00
12/19/22	JAN	Multiple email with KLD regarding importing search results and modifying searches to include various email and review hit reports and search results (1.0); download Mark Gray deposition transcripts/exhibits and emails with Judy Miller and counsel regarding same (.60).	1.60	400.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129809

Date	Atty	Description Of Services Rendered	Hours	Amount
12/19/22	JGM	Review and consider letter from David Saperstein about discovery issues (.30), Transmit same to Paul Neitzel and Chris Peirce and address scheduling call to review and to consider same (.20), Participate in conference call with Paul Neitzel, Chris Peirce and Kim Clayson to address and to consider how to respond to David Saperstein's letter (.60), Email to Luke Wolf about status of rescheduling Mark Gray's deposition (.10), Address Travis Baldwin's deposition and responding to David Saperstein's letter (.40), Review and respond to email from David Saperstein about scheduling call to discuss discovery issues (.10), Schedule call to discuss discovery issues (.10), Review email from Todd Almassian about same (.10).	1.90	950.00
12/19/22	KRC	Response to D. Saperstein and at Almassian about discovery letter.	.30	105.00
12/19/22	KRC	Received and returned phone message from T. Baldwin's counsel J. Henry and email to J. Henry.	.40	140.00
12/19/22	KRC	Meeting with Rock Creek about discovery compliance.	.50	175.00
12/19/22	KRC	Call with T. Baldwin's counsel addressing questions on discovery request from D. Saperstein.	.30	105.00
12/19/22	KRC	Received and reviewed emails about outstanding employment agreements for production.	.20	70.00
12/20/22	JGM	Participate in conference call with counsel (Luke, David, Todd and Kim) regarding discovery issues (1.0), Follow up calls with Kim about same (multiple calls) (.50), Review email to David Saperstein (.10), Address use of affidavit and declaration for mediation (.50), Address issues for mediation brief and action to be taken with Kim (.50).	2.60	1,300.00
12/20/22	KRC	Discovery call with D. Saperstein.	.50	175.00
12/20/22	KRC	Research for mediation brief.	2.00	700.00
12/21/22	JAN	Download Plante Moran document production and emails with Judy Miller regarding same (.40); create matter in CaseNotebook and load deposition transcripts (.40); emails/calls with Kim Clayson regarding Michele Sellers search term hits to promote to relativity and emails with KLD regarding same (.90).	1.70	425.00
12/21/22	JGM	Address discovery issues raised by David Saperstein with Kim Clayson (.50), Address status of discovery with Nick Laue (.20), Address status of discovery issues and litigation disclosed in SOFA's with Paul and Chris (.20), Exchange emails with them about same (.20), Address email from Jeff Bailey about producing documents (.20), Follow up call with Jeff Bailey about same (.20), Email to Jeff Bailey to confirm production of financial statements (.20), Review letter from Jeff Bailey about production (.20), Address production from Plante Moran with David Distel (.20), Address production of documents from Plante Moran with Julie Norton (.10).	2.40	1,200.00
12/21/22	KRC	Attention to email search results on Michele Sellers emails.	.50	175.00
12/22/22	JAN	Call with Judy Miller regarding annotating deposition transcripts (.20), telephone call with Kim Clayson regarding options for searching/producing Barfly emails (.20), download and transfer Michele Sellers deposition to CaseNotebook (.40), review relativity searches and set-up new search for Kim to review (.40), and emails with KLD and Kim Clayson regarding search details (.40).	1.60	400.00
12/22/22	JGM	Address various discovery issues and how to proceed with Kim Clayson (multiple emails and conversation) (.40), Review and note Mark Sellers deposition transcript (4.0), Address continued depositions and securing court reporter for same (.20), Address email from Paul Neitzel about unwillingness of Sorum to sign declaration (.10).	4.70	2,350.00
12/22/22	KRC	Attention to discovery issues related to email search response to D. Saperstein, access to transcripts and Plante Moran documents.	.60	210.00
12/23/22	JGM	Address discovery issues (.40), Review documents produced by Plante Moran (.30), Email to Jeff Bailey about same (.20).	.90	450.00
12/23/22	KRC	Reviewed Michele Sellers emails.	6.50	2,275.00
12/24/22	JGM	Review email from Chris Peirce about voting agreement.	.20	100.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129809

Date	Atty	Description Of Services Rendered	Hours	Amount
12/26/22	JGM	Review and consider emails from Kim Clayson about review of Michele Sellers' emails (.30), and next steps (.40), Address email from Eric Linden about waiver issue (.10).	.80	400.00
12/26/22	KRC	Continued review of Michele Sellers Barfly.com.	3.70	1,295.00
12/26/22	KRC	Reviewed Michele Sellers discovery regarding supplementation requirements.	.30	105.00
12/27/22	EAL	Conferences with Kim Clayson re waiver of attorney client privilege by use of corporate email account.	.20	98.00
12/27/22	JAN	Download, review, organize, bates label, and prepare financial documents from Plante Moran for production (1.0) address deposition annotations and export report (.50).	1.50	375.00
12/27/22	JGM	Address production of Plante Moran financial statements to defendants' counsel (.30), Email to Jeff Bailey to address password for documents (.20), Address discovery issues and mediation brief with Kim Clayson (.50), Email to Luke Wolf, Todd Almassian and Nick Laue about production of eDiscovery (.30), Email to Paul Neitzel and Chris Peirce about damages calculation and scheduling call to address same (.20), Respond to email from Chris Peirce about meeting and mediation (.20), Address scheduling call with financial consultants/experts to prepare for mediation (.20), Review and respond to email from Luke Wolf about eDiscovery (.20), Review and respond to email from Nick Laue about eDiscovery (.20), Address and follow-up regarding eDiscovery and next steps (.30).	2.70	1,350.00
12/27/22	KRC	Draft of mediation brief.	7.50	2,625.00
12/27/22	KRC	Received and reviewed supplemental discovery responses from Michele Sellers.	.50	175.00
12/28/22	JAN	Review folder structure in relativity and emails with KLD regarding folders for Plante Moran documents.	.30	75.00
12/28/22	JGM	Address mediation brief and discovery issues with Kim Clayson (multiple calls) (.50), Address costs at current time and dealing with David Saperstein with Kim Clayson and Tom Bruinsma (.20), Conference call with David Distel, Paul Neitzel, Chris Peirce and Kim Clayson about preparation for mediation, solvency analysis, damages analysis, outstanding and upcoming discovery and depositions (1.5), Review Mark and Michele Sellers' deposition (1.0), Follow up call with Paul Neitzel about costs/fees for mediation (.10), Review emails from David Distel and Jeff Bailey about additional documents sought (.20), Review email from David Distel about fairness opinion (.10).	3.60	1,800.00
12/28/22	KRC	Draft mediation brief.	3.30	1,155.00
12/28/22	KRC	Meeting with J. Miller, D. Distel, C. Peirce, P. Neitzel and T. Bruinsma regarding damages calculation for mediation.	1.00	350.00
12/29/22	JAN	Download Mark Gray production (.30), prepare for loading the relativity, and emails with KLD regarding same (.30); export annotation report of Michele Sellers' transcript (.30); draft bates number cross-reference chart for Plante Moran financial documents (.30), prepare bates labeled version for loading to relativity, and emails with KLD regarding same (.20).	1.40	350.00
12/29/22	JGM	Address discovery issues with Kim Clayson (.20), Review and respond to emails from Julie Norton and Kim Clayson about discovery (.20), Email to and from Luke Wolf about production of discovery (.40), emails to and from David Saperstein about objections related to Travis Baldwin deposition (.20), Review objections to subpoenas and documents by Travis Baldwin and congruent (.50), Complete review of Michele Sellers transcript (1.0), Email to Julie Norton about same (.10).	2.60	1,300.00
12/30/22	JAN	Emails with KLD and Kim Clayson regarding uploading of Mark Gray production to relativity.	.20	50.00
12/30/22	JGM	Review, address and consider email from David Saperstein about discovery issues (.40).	.60	300.00
12/30/22	KRC	Received and reviewed D. Saperstein email about discovery dispute and referenced discovery request to provide notes correcting email summary.	.30	105.00
12/30/22	KRC	Research about attorney-client privilege on work account.	1.00	350.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129809

TOTAL PROFESSIONAL SERVICES	\$ 54,518.00
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MATTER TOTAL	\$ 54,518.00
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SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Eric A. Linden	Partner	.20	490.00	98.00
Julie A. Norton	Paralegal	17.10	250.00	4,275.00
Judith G. Miller	Partner	65.50	500.00	32,750.00
Kimberly Clayson	Partner	49.70	350.00	17,395.00
TOTALS		132.50		\$ 54,518.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129809

RE: DISBURSEMENTS

COSTS ADVANCED

	Description	Amount
12/01/22	Deposition/transcript, GERALD HANSON & ASSOCIATES INC., Hanson Invoice re Mark Gray Statement on the Record (11-22-2022)	263.90
12/02/22	Postage	2.43
12/06/22	Transcript fees -- vendor: gerald hanson & associates, inc.	929.00
12/08/22	Pacer charges net charges	4.30
12/12/22	Transcript fees -- vendor: gerald hanson & associates, inc.	1,360.80
12/20/22	Westlaw charges	237.60
12/27/22	Copying/printing	67.35
12/31/22	E-Discovery - Tech Support	1,437.75
12/31/22	E-Discovery - Storage	1,730.00
TOTAL COSTS ADVANCED		\$ 6,033.13
MATTER TOTAL		\$ 6,033.13

Client/Matter # TBC7BV/EMP

Invoice #: 6129809

RE: **EMPLOYMENT****PROFESSIONAL SERVICES RENDERED**

Date	Atty	Description Of Services Rendered	Hours	Amount
12/27/22	JGM	Email to Lauren Sell about preparing revised appearances and amended declaration for Taft disclosures (.20), Address revised appearances and amended declaration with Lauren Sell (.30).	.50	250.00
12/28/22	KRC	Call with J. Miller and T. Bruinsma about amended disclosures required post-merger.	.30	105.00
TOTAL PROFESSIONAL SERVICES				\$ 355.00
MATTER TOTAL				\$ 355.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Partner	.50	500.00	250.00
Kimberly Clayson	Partner	.30	350.00	105.00
TOTALS		.80		\$ 355.00

January 2023



Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

Tel: 248.351.3000 / Fax: 248.351.3082

www.taftlaw.com

FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129813

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through January 31, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	100,908.50	.00	100,908.50
CLAIMS	CLAIMS ADMINISTRATION	500.00	.00	500.00
DISB	DISBURSEMENTS	.00	4,138.23	4,138.23
EMP	EMPLOYMENT	1,652.50	.00	1,652.50
Total		103,061.00	4,138.23	107,199.23
TOTAL THIS INVOICE				\$ 107,199.23

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129813

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
1/02/23	KRC	Review of Mark Gray email response search.	2.00	700.00
1/03/23	JGM	Address proposed response to David Saperstein's email and continued deposition of Michele Sellers with Kim Clayson (multiple calls) (.70), Review and revise proposed response to David Saperstein's email and transmit to Kim Clayson (1.0), Preparation of statement of facts for mediation brief (4.5), Review emails from Kim Clayson and Paul Neitzel about employee handbook (.10). Review and address response from David Saperstein to discovery requests (.20), Address same with Kim Clayson (.20), Transmit same to client to review (.10), Address emails concerning discovery from Michele Sellers (.10).	7.00	3,500.00
1/03/23	KRC	Reviewed Michele Sellers' further production of documents and prepared for final segment of deposition.	4.00	1,400.00
1/03/23	KRC	Preparation for Mark Gray deposition.	4.00	1,400.00
1/03/23	KRC	Draft and send response to D. Saperstein email about discovery dispute.	.40	140.00
1/03/23	KRC	Email to Todd Almassian seeking divorce file.	.20	70.00
1/04/23	JGM	Prepare for depositions and address same with Ms. Clayson (.30), Attend deposition of Mark Gray (4.0), Attend deposition of Michele Sellers (.50), Follow up call with Paul Neitzel and Kim Clayson about next steps (.30), Emails to and from client about availability for a call and scheduling same (.10), Email to Paul Neitzel to provide additional documents on valuation to Dave Distel (.10), Address and transmit letter from David Saperstein about concurrence in motion to dismiss to client (.20), Address status, options, strategy, discovery issues and how to proceed (.50), Address scheduling of call with Paul Neitzel (.10).	6.10	3,050.00
1/04/23	KRC	Preparation for Mark Gray deposition.	2.50	875.00
1/04/23	KRC	Conference with J. Miller and P. Neitzel about depositions results, mediation strategy and discovery issues.	.30	105.00
1/04/23	KRC	Deposition of Mark Gray.	5.00	1,750.00
1/04/23	KRC	Preparation for deposition of Michele Sellers.	.40	140.00
1/04/23	KRC	Address Michele Sellers's deposition.	.40	140.00
1/05/23	PRH	Review analysis letter from defendants.	.90	391.50
1/05/23	JAN	Search Relativity for employment manuals and Profit and Loss statements (1.1), review results, and emails with Kim Clayson regarding same (.30); Down pdf copies of emails from Kim Clayson and rename to include sort date for comparison to natives in Relativity (.30).	1.70	425.00
1/05/23	JGM	Address and transmit settlement proposal from Todd Almassian to client (.50), Address discovery issues and facts for mediation with Kim Clayson (.30), Review and respond to email from Ms. Clayson about new information found on knowledge of Michele Sellers (.10), Review email from Ms. Clayson about proposed supplemental responses to discovery (.30), Review emails from David Distel and Jeff Bailey about indexes for accounting records (.20), Participate in conference call with Paul Neitzel, Chris Peirce, David Distel, Kim Clayson and client about preparation for mediation, solvency and damages analyses, discovery issues, settlement offer from Todd Almassian and letter from David Saperstein (2.2).	3.90	1,950.00
1/05/23	KRC	Conference with J. Miller, C. Peirce, P. Neitzel, T. Bruinsma and D. Distel about damages calculation, discovery issues and correspondence from defendants.	2.20	770.00
1/05/23	KRC	Compiled Michele Sellers Barfly.com email exhibits (1.0), review and analysis of Michele Sellers discovery request for compliance with supplementation requirements to determine production (1.0).	2.00	700.00
1/05/23	KRC	Reviewed Michele Sellers transcripts to identify inaccurate testimony in connection with email contents found on Michele Sellers Barfly.com email account.	1.20	420.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129813

Date	Atty	Description Of Services Rendered	Hours	Amount
1/05/23	KRC	Email Relativity search notes to J. Norton for assistance in finding certain attachments - P&Ls provided to Michele Sellers, affidavit of Mark Sellers and employee handbook.	.50	175.00
1/05/23	KRC	Research waiver of fiduciary duties for limited liability companies.	.40	140.00
1/06/23	JAN	Emails with Kim Clayson regarding production of emails.	.20	50.00
1/06/23	JGM	Address next steps and action to be taken with Kim Clayson (.40), address settlement letter and scheduling a call with Todd Almassian (.20), review settlement letter and cases transmitted by Todd Almassian (2.0), preparation of email to Kim Clayson with thoughts on letter and for preparation for call with Todd on Monday (1.0), confer with Dave Distel about solvency analysis (.50), email to Paul Neitzel about revised exhibit on transfers for complaint (.10), review revised exhibit and provide comments to Paul Neitzel about same (.20), address amended response to Mark Sellers' discovery with Kim Clayson (.40), email to and from David Saperstein about letter seeking concurrence in dismissal motion (.10), review and consider additional eDiscovery about Michele Sellers and employment practices book (1.0), review revised exhibit from Paul Neitzel and address with Kim Clayson (.10), review and revise amended response to Sellers discovery (.30), email to Kim Clayson about same and other issues to address (.20).	5.50	2,750.00
1/06/23	KRC	Legal research for mediation brief and drafting of legal arguments.	3.90	1,365.00
1/06/23	KRC	Work on further revisions to amended Mark Sellers discovery.	.40	140.00
1/06/23	KRC	Received and revised over notes for call with Michele Sellers' counsel.	.20	70.00
1/07/23	JAN	Search for final Affidavit of Assets, review results, and emails with Kim Clayson regarding same; Review pdf emails and compare with emails coded in Relativity and emails with Kim Clayson/Judy Miller with coding/production questions.	1.20	300.00
1/07/23	JGM	Address various issues attendant to case and mediation brief with Kim Clayson (multiple calls) (.50), exchange emails with Julie Norton about accessing eDiscovery (.10).	.60	300.00
1/07/23	KRC	Attention to discovery production for supplementation requirements for Mark Sellers discovery request and Michele Sellers discovery requests.	.60	210.00
1/07/23	KRC	Preparation of draft mediation brief.	3.20	1,120.00
1/08/23	JGM	Address and consider analysis of "knowledge of voidability" in preparation for call with Todd Almassian (.50).	.50	250.00
1/08/23	KRC	Analysis of cases cited by Todd Almassian in settlement letter.	2.00	700.00
1/09/23	JAN	Emails with Judy Miller regarding exhibits to financial affidavit and with KLD regarding imaging documents for production.	.30	75.00
1/09/23	JGM	Prepare for conference call with Todd Almassian (.40), conference call with Todd Almassian and Kim Clayson about settlement proposal (1.0), review follow up emails with Jeff Bailey and David Distel about audit records (.20), address status and next steps (.30).	2.10	1,050.00
1/09/23	KRC	Settlement call with Todd Almassian.	1.00	350.00
1/09/23	KRC	Email to Todd Almassian with email communications to be added to discovery.	.50	175.00
1/10/23	PRH	Consider mediation strategy.	.20	87.00
1/10/23	JGM	Address status and action to be taken (.20), review and respond to email from David Distel about missing information needed and status of completing analyses (.20), review and revise draft mediation brief (.30), research on "knowledge of avoidability" for section 550 purposes and liability for "subsequent transferee" (1.8), address follow up email from David Distel (.10).	2.80	1,400.00
1/10/23	KRC	Research regarding "knowledge" and "good faith".	1.30	455.00
1/10/23	KRC	Preparation of draft mediation brief.	5.50	1,925.00
1/11/23	LES	Efile 6 Notice of Appearances for Kim, Paul and Judy in Bankruptcy and Adversary case; efile Supplemental Disclosure.	1.00	235.00
1/11/23	JGM	Address mediation brief, facts and law for brief, and how to proceed (1.0), review and revise mediation brief (3.2), review revised damage calculation circulated by Paul Neitzel (.20), email to Paul about same (.20), research on breach of fiduciary duty (.50).	5.10	2,550.00
1/11/23	KRC	Address mediation brief.	1.00	350.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129813

Date	Atty	Description Of Services Rendered	Hours	Amount
1/11/23	KRC	Further research on knowledge, MCL 450.4409 and statute of limitations.	2.20	770.00
1/11/23	KRC	Review and revise legal arguments and addition of legal authority.	1.50	525.00
1/12/23	PRH	Discuss mediation strategy with J. Miller and K. Clayson.	.30	130.50
1/12/23	JGM	Address amendment of discovery responses and other matters related to mediation brief and preparation for mediation (1.0), address discovery, mediation, potential settlement with Michele Sellers and other claims with Tom Bruinsma (.50), emails to and from Todd Almassian about scheduling a call (.10), conference call with Todd Almassian and Kim Clayson about settlement options (.50), address follow up call from Todd Almassian about settlement (.10), advise Tom Bruinsma of results of call and action requested by Todd (.20), address revision of damages exhibit with Paul Neitzel (.20), review emails from David Distel about solvency analyses (.30), review emails from Paul Neitzel about damages analyses (.30), email to Todd Almassian about settlement proposal (.50).	3.70	1,850.00
1/12/23	KRC	Conference with Judy Miller about evidence and legal analysis and mediation strategy.	1.00	350.00
1/12/23	KRC	Work on mediation brief edits to address page count, legal arguments and cleaning up facts.	3.50	1,225.00
1/13/23	JAN	Emails with Kim Clayson regarding coding issues, update coding, prepare emails for production, and prepare production instructions to KLD (6.0); Import Michele Sellers and Mark Gray deposition transcripts to CaseNotebook (.20), email transcripts/exhibits to clients (2.0).	1.00	250.00
1/13/23	JGM	Conference call with David Distel, Greg Simsa, Paul Neitzel, Chris Peirce, Kim Clayson and Thomas Bruinsma about damages exhibits and calculation for mediation brief (1.0), follow up conference call on solvency analysis for mediation brief with David Distel, Greg Simsa, Paul Neitzel, Chris Peirce, Kim Clayson and Thomas Bruinsma (1.8), follow up call with David Distel about analysis (.20), review and address 2012 tax return of Mark Sellers with Kim Clayson (.40), address filing of amended exhibit to complaint (.20), email to Paul Neitzel about same (.10), email to David Distel about mediation brief (.10), follow up call with David Distel about deposition transcripts (.20), email to Julie Norton to send transcripts and exhibit to David, Paul, Chris and Tom (.10), review and respond to email from Dave Distel about "to do" list (.20), review and Mark up deposition transcript of Mark Gray (1.2), review Amended Exhibit B to complaint and provide comments to Paul Neitzel with needed revision (.20).	5.50	2,750.00
1/13/23	KRC	Review and revise to mediation brief.	3.50	1,225.00
1/13/23	KRC	Review of insolvency standard for MUFTA and 548.	.40	140.00
1/13/23	KRC	Conference with expert witness, financial advisor and Judy Miller about insolvency analysis and damages analysis.	2.50	875.00
1/14/23	JGM	Address and review amended Exhibit B for complaint (.20), email to Paul Neitzel regarding changes needed (.10), review revised amended Exhibit B and address filing and service of same (.30), review and respond to email from David Distel regarding remaining deliverables for insolvency analysis (.30), review follow up emails from Chris Peirce and David Distel about same (.10).	1.00	500.00
1/14/23	KRC	Final proofread of mediation brief to share with Judy Miller and Paul Hage.	.60	210.00
1/15/23	JGM	Review and markup of deposition transcripts of Mark Gray (6.0), address status and Gray transcript with David Distel (.20), review and markup of second day deposition transcript of Michele Sellers (.20), review and revise mediation brief (3.0), provide comments to Kim Clayson about mediation brief with Kim Clayson (.40).	9.80	4,900.00
1/15/23	KRC	Review and consider mediation notes for revisions to brief.	.20	70.00
1/16/23	PRH	Correspondence and calls with J. Miller and K. Clayson regarding mediation brief (1.0); Review and revise draft of brief (2.0); Phone call with K. Clayson (.40).	3.40	1,479.00
1/16/23	JAN	Download production from KLD and emails with KLD regarding providing and ESI production as well.	.30	75.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129813

Date	Atty	Description Of Services Rendered	Hours	Amount
1/16/23	JGM	Address mediation brief (multiple calls) with Kim Clayson (.15), follow up call with Paul Hage and Kim Clayson about same (.20), review and consider counteroffer regarding settlement of claims against Michele Sellers from Todd Almassian (.20), forward counteroffer to Tom Bruinsma (.20), work on transcript citations for mediation brief (1.2), conference call with Paul Neitzel, Chris Peirce, Greg Simsa, David Distel, Tom Bruinsma and Kim Clayson to finalize damages and solvency analyses (1.6), follow up call with Kim Clayson and Tom Bruinsma about mediation and mediation brief (.20), review and address edits by Paul Hage to mediation brief (.20), email to Todd Almassian about rejection of settlement counteroffer (.10), email to Kim Clayson about additional transcript references from Sellers transcript for mediation brief (.30).	5.50	2,750.00
1/16/23	KRC	Preparation of mediation exhibits.	.60	210.00
1/16/23	KRC	Address mediation brief revisions.	6.70	2,345.00
1/16/23	KRC	Conference with Judy Miller, Dave Distel, Paul Neitzel and Tom Bruinsma to review damages analysis and insolvency analysis.	1.50	525.00
1/17/23	EMM	Review of Insurance policy language; review of prior memo re coverage; call with K.Clayson re mediation.	.60	204.00
1/17/23	PRH	Phone call and correspondence with J. Miller and K. Clayson re mediation strategy.	.50	217.50
1/17/23	JAN	Emails with Kim Clayson regarding production of Michele Sellers' emails (.20), investigate counsel's assertion that we did not produce attachments (.50), emails with Judy Miller regarding searches conducted (.20).	1.00	250.00
1/17/23	JGM	Address mediation brief with Kim Clayson and Paul Hage (.40), review and revise brief and insert updated citations to brief (2.5), review and respond to email about insurance policy (.20), address mediation brief with Tom Bruinsma and Kim Clayson (.20), review comments to brief from Paul Neitzel (.20), review comments to brief from David Distel (.20), address mediation brief with David Distel and Kim Clayson (.20), address and consider materials needed for mediation (.40), start assembling materials for mediation (1.3), review and address letter from David Saperstein and notice of deposition of Travis Baldwin and send to client (.20), review and revise brief and transmit to Kim Clayson and to client to review (3.0).	8.80	4,400.00
1/17/23	KRC	Preparation of mediation brief.	7.60	2,660.00
1/17/23	KRC	Preparation of brief final, address revisions of mediation.	.30	105.00
1/17/23	KRC	Conference with Emily Mayer about negligence standard in insurance policy.	.40	140.00
1/18/23	PRH	Address mediation issues.	.40	174.00
1/18/23	JGM	Address exhibits and revisions for mediation brief (1.2); final review and revision of mediation brief (3.2); confer with Tom Bruinsma about mediation brief and mediation (.30); review and address email from David Distel about mediation brief revisions (.20); transmit mediation brief from Todd Almassian to Tom Bruinsma (.10); transmit mediation brief from David Saperstein to Tom Bruinsma (.10); transmit to client our final mediation brief (.10); address transmittal of exhibits to David Saperstein (.20).	5.40	2,700.00
1/18/23	KRC	Draft and preparation of mediation summary - research and editing.	6.20	2,170.00
1/19/23	PRH	Address mediation strategy.	.60	261.00
1/19/23	JAN	Export annotation report of each of the deposition transcripts and emails with Judy Miller regarding same.	.50	125.00
1/19/23	JGM	Address mediation preparation and failure of Luke Wolf to provide brief (20); exchange emails with Julie Norton to address obtaining deposition summaries for mediation binder (.20); exchange emails with Luke Wolf about mediation brief (.20); email to Lee Silver about mediation briefs and preparation for mediation (.20); address mediation with Paul Hage (.20); address materials for mediation binders (.20); address issues for mediation and preparation for mediation (.40); emails from and to Lee Silver about mediation (.10); review and consider mediation statement submitted by Todd Almassian on behalf of Michele Sellers (.50); email to client to address mediation and mediation briefs filed (.20).	2.20	1,100.00
1/19/23	KRC	Prepare for mediation attendance and reviewed Mark Sellers' mediation brief.	1.50	525.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129813

Date	Atty	Description Of Services Rendered	Hours	Amount
1/20/23	JGM	Address preparation for mediation (.30); address transmittal of binder with Saperstein's mediation brief and exhibits to client (.20); email to Thomas Bruinsma about same (.10); address and respond to email regarding extension of license for obtaining emails (.20).	.80	400.00
1/20/23	KRC	Attention to opposing counsel mediation briefs and documents for mediation.	.50	175.00
1/21/23	PRH	Attend Barfly mediation planning call.	1.50	652.50
1/21/23	JGM	Conference with Paul Hage, Kim Clayson, David Distel, Chris Peirce, Paul Neitzel and Tom Bruinsma to prepare for mediation (1.6); follow up call with Tom Bruinsma about mediation and settlement parameters (.20).	1.70	850.00
1/21/23	KRC	Attend Barfly mediation planning call.	1.50	525.00
1/22/23	PRH	Review mediation briefs in preparation for mediation.	1.90	826.50
1/22/23	JGM	Preparation of bullet point outline for business judgment (1.0); address same with Kim Clayson (.20); call with Luke Wolf and Kim Clayson about mediation (.20); review and consider mediation brief of Luke Wolf (1.0); address same with Kim Clayson (.20).	2.20	1,100.00
1/22/23	KRC	Travel to Grand Rapids for mediation.	2.50	875.00
1/22/23	KRC	Review mediation briefs, prepare list of facts to distinguish Sec. 550 with knowledge of voidability standard.	2.00	700.00
1/23/23	PRH	Travel to Grand Rapids for mediation.	1.50	652.50
1/23/23	PRH	Attend mediation in Grand Rapids.	11.50	5,002.50
1/23/23	JGM	Prepare for mediation (2.0); attend mediation (11.5).	13.50	6,750.00
1/23/23	KRC	Attend mediation.	11.50	4,025.00
1/23/23	KRC	Preparations for mediation and review of case law.	1.00	350.00
1/23/23	KRC	Attend pre-mediation planning call.	1.00	350.00
1/23/23	KRC	Return travel to Detroit from mediation.	2.50	875.00
1/24/23	JGM	Advise to Judge Boyd's chambers about settlement of case at mediation (.20); advise David Saperstein of same and need to cancel Travis Baldwin's deposition (.10); advise Todd Almassian of same (.10), advise Luke Wolf of same (.10); transmit executed settlement term sheet to client and advise of action being taken (.20); review and transmit mediator's report to client (.20); preparation of settlement pleadings and documents (5.0).	5.90	2,950.00
1/24/23	KRC	Attention to post-mediation matters on motion to compromise and claims analysis decisions.	.40	140.00
1/25/23	JGM	Review and revise settlement documents/pleadings (.50), transmit settlement documents/pleadings to client (.20); address same and next steps with Tom Bruinsma (multiple calls) (.30).	1.00	500.00
1/25/23	KRC	Read over settlement agreement and settlement motion for final revisions.	1.50	525.00
1/26/23	JAN	Address pending settlement and archival of Relativity workspace.	.20	50.00
1/30/23	JGM	Address bar date with Paul Hage (.10); confer with Tom Bruinsma about claims bar date and settlement pleadings (.30); email draft settlement pleadings/documents to Luke Wolf, David Saperstein and Todd Almassian (.20).	.60	300.00

TOTAL PROFESSIONAL SERVICES \$ 100,908.50

MATTER TOTAL \$ 100,908.50

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129813

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Emily M. Mayer	Partner	.60	340.00	204.00
Paul R. Hage	Partner	22.70	435.00	9,874.50
Julie A. Norton	Paralegal	6.40	250.00	1,600.00
Lauren E. Sell	Paralegal	1.00	235.00	235.00
Judith G. Miller	Partner	101.20	500.00	50,600.00
Kimberly Clayson	Of Counsel	109.70	350.00	38,395.00
TOTALS		241.60		\$ 100,908.50

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129813

RE: CLAIMS ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
1/25/23	JGM	Address claims review process with Paul Neitzel (.20).	.20	100.00
1/30/23	JGM	Review docket to address whether notice to file claims yet transmitted (.20); address claims review process with Chris Peirce (.30); email to client about same and status of settlement documents/pleadings (.30).	.80	400.00
TOTAL PROFESSIONAL SERVICES				\$ 500.00
MATTER TOTAL				\$ 500.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	1.00	500.00	500.00
TOTALS		1.00		\$ 500.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129813

RE: DISBURSEMENTS

COSTS ADVANCED

Description	Amount
1/11/23 Search Fees - PACER.gov	4.90
1/11/23 Search Fees - PACER.gov	.80
1/11/23 ESI discovery	1,500.00
1/12/23 Deposition/transcript, GERALD HANSON & ASSOCIATES INC., Invoice for Mark Gray Vol 2 Transcript	1,446.70
1/19/23 1Z17A5050108094647-Next Day Air Residential	22.35
1/19/23 1Z17A5050108094647-Residential Surcharge	5.85
1/19/23 1Z17A5050108094647-Fuel Surcharge	5.22
1/19/23 1Z17A5050124170695-Next Day Air Commercial	22.35
1/19/23 1Z17A5050124170695-Fuel Surcharge	4.14
1/20/23 Copying/printing	835.35
1/20/23 1Z17A5054431546730-Next Day Air Commercial	19.29
1/20/23 1Z17A5054431546730-Saturday Delivery	16.00
1/20/23 1Z17A5054431546730-Fuel Surcharge	6.53
1/20/23 1Z17A5054431599728-Next Day Air Residential	19.29
1/20/23 1Z17A5054431599728-Residential Surcharge	5.85
1/20/23 1Z17A5054431599728-Saturday Delivery	16.00
1/20/23 1Z17A5054431599728-Fuel Surcharge	7.61
1/20/23 1Z17A5054431546730-Shipping Charge Correction Next Day Air	3.06
1/20/23 1Z17A5054431546730-Shipping Charge Correction Fuel Surcharge	.57
1/20/23 Relativity Data Hosting Fee, Project Barfly LLC, Project Barfly Invoice re KL Discovery charges	196.37
TOTAL COSTS ADVANCED	\$ 4,138.23
MATTER TOTAL	\$ 4,138.23

Client/Matter # TBC7BV/EMP

Invoice #: 6129813

RE: EMPLOYMENT

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
1/03/23	LES	Draft amended Notice of Appearances for Paul Hage, Kim Clayson and Judy Miller (.30); draft Amended Declaration (.90).	1.20	282.00
1/05/23	LES	Address and revise Supplemental Declaration.	.30	70.50
1/05/23	JGM	Review and revise supplemental declaration of disinterestedness (1.2), Address same with Lauren Sell and direct her regarding action to be taken (.30), Follow up call with Paul Hage about same (.10), Direct Ms. Sell to make corrections to certificate of service on supplemental declaration and action to be taken (.20).	1.80	900.00
1/10/23	JGM	Address revised supplemental disclosure and transmit same and amended appearances to client to review (.20), address follow up email from David Distel (.10).	.20	100.00
1/11/23	JGM	Address filing of amended appearances and supplemental disclosure of disinterestedness with Lauren Sell (.20), email to Michael Maggio and Dean Reitberg about supplemental declaration of disinterestedness (.20), email to Tom Bruinsma about filing, status and action to be taken (.20).	.60	300.00

TOTAL PROFESSIONAL SERVICES \$ 1,652.50

MATTER TOTAL \$ 1,652.50

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Lauren E. Sell	Paralegal	1.50	235.00	352.50
Judith G. Miller	Partner	2.60	500.00	1,300.00
TOTALS		4.10		\$ 1,652.50

February 2023

Taft Stettinius & Hollister LLP

27777 Franklin Road, Suite 2500 / Southfield, MI 48034-8214

Tel: 248.351.3000 / Fax: 248.351.3082

www.taftlaw.com

FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129814

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through February 28, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	5,440.00	.00	5,440.00
DISB	DISBURSEMENTS	.00	182.22	182.22
Total		5,440.00	182.22	5,622.22
TOTAL THIS INVOICE				\$ 5,622.22

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129814

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
2/06/23	JGM	Review email from David Saperstein about settlement documents/pleadings (.10); address David Distel's fees with Paul Hage.	.80	400.00
2/08/23	JGM	Advice to and from Todd Almassian about settlement documents/pleadings (.30); address status of settlement documents/pleadings; review email and revised settlement documents/pleadings from David Saperstein (.30); email to Tom Bruinsma about revised settlement documents/pleadings (.20).	1.10	550.00
2/10/23	JGM	Review email from Luke Wolf and proposed revisions to settlement documents/pleadings (.20); email to Thomas Bruinsma about same and other matters (.30); review and respond to email from David Saperstein about settlement documents/pleadings (.20), transmit email to Thomas Bruinsma to discuss (.20); call with Tom Bruinsma about settlement pleadings/documents and issues related thereto (.30); follow up call with David Saperstein about settlement documents/pleadings (.20).	1.40	700.00
2/13/23	JGM	Address settlement documents/pleadings (.20) address proposed revisions with client; (.30); review and revise settlement pleadings/documents (.40); address invoice with David Distel (.20); transmit revised settlement pleadings/documents to Tom Bruinsma for review and approval (.10), review and transmit letter from Lee Silver to client to remit payment thereon (.30).	1.50	750.00
2/14/23	JGM	Address status of revised settlement pleadings/documents with client (.20); email to David Saperstein about revised settlement documents/pleadings (.30).	.50	250.00
2/16/23	JGM	Review emails about adjourning status conference (.20); conference call with Shelley (Judge Boyd's clerk) and Kim Clayson about adjourning status conference (.20); review follow up emails about same (.20).	.60	300.00
2/16/23	KRC	Attention to adjournment of status conference.	.60	210.00
2/17/23	JGM	Exchange emails with David Saperstein about status of finalizing settlement documents/pleadings (.20).	.20	100.00
2/22/23	JGM	Review and docket notice of adjourned status conference from court (.20); advise to and from David Saperstein about status of settlement (.20); follow up call to David Saperstein about same (.10); advise client of status (.10); follow up email to David Saperstein about settlement documents and issues related to finalizing same (.20); review follow-up emails from David Saperstein about settlement (.20); confer with David Saperstein about settlement alternatives (.30).	1.30	650.00
2/22/23	KRC	Received and read correspondence from Zurich about release and signatories on settlement agreement.	.50	175.00
2/24/23	JGM	Address status with David Saperstein (.20); advise Tom Bruinsma of same (.20); emails to and from David Saperstein about same (.30).	.70	350.00
2/27/23	JGM	Follow up email to David Saperstein about settlement documents.	.20	100.00
2/27/23	KRC	Read email exchange with insurance counsel about status of signing settlement agreement.	.20	70.00
2/28/23	JGM	Review email and consider changes to settlement documents from David Saperstein (.30); follow-up call with David Saperstein about same (.20); email to client to address changes and how to proceed (.30); address options with Kim Clayson (.20); follow up call with David Saperstein about waiver/acknowledgment of no claims (.20); email to David about same and providing language to address (.20), address status with Tom Bruinsma (.20).	1.60	800.00
2/28/23	KRC	Received and read update about terms on Zurich claims waiver request to opposing counsel.	.10	35.00

TOTAL PROFESSIONAL SERVICES

\$ 5,440.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129814

MATTER TOTAL**\$ 5,440.00****SUMMARY OF PROFESSIONAL SERVICES****SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	9.90	500.00	4,950.00
Kimberly Clayson	Of Counsel	1.40	350.00	490.00
TOTALS		11.30		\$ 5,440.00

Client/Matter # TBC7BV/DISB

Invoice #: 6129814

RE: **DISBURSEMENTS****COSTS ADVANCED**

Description	Amount
2/09/23 Mileage, PAUL HAGE, Mileage to/from mediation	182.22
TOTAL COSTS ADVANCED	\$ 182.22
MATTER TOTAL	\$ 182.22

March 2023



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129815

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through March 31, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	4,545.00	.00	4,545.00
DISB	DISBURSEMENTS	.00	3.90	3.90
FEEAPP	FEE APPLICATIONS	50.00	.00	50.00
Total		4,595.00	3.90	4,598.90

TOTAL THIS INVOICE	\$ 4,598.90
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Client/Matter # TBC7BV/ASSETA

Invoice #: 6129815

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
3/03/23	JGM	Email to David Saperstein to address status of settlement documents.	.10	50.00
3/06/23	JGM	Advise to David Saperstein about status of settlement documents/pleadings; follow up email to David Saperstein about same; follow up email from David Saperstein about same.	.40	200.00
3/07/23	JGM	Emails to client about status and options (.20); email from David Saperstein about settlement documents (.20); review and revise settlement documents and circulate to David Saperstein to review and to approve (1.0), circulate final settlement documents/pleadings to parties to sign (.20).	1.60	800.00
3/07/23	KRC	Reviewed and responded to email about Zurich settlement terms.	.20	70.00
3/08/23	JGM	Exchange emails with David Saperstein about status of settlement documents (.20); follow up email to David Saperstein about having final settlement agreement signed (.20); email to Todd Almassian and Luke Wolf about final settlement agreement and having it signed (.20); follow up email to client to sign final settlement agreement (.10); address signature page received from Todd Almassian (.10); address invoices owed to Project Barfly and email to Julie Norton about same (.20).	.80	400.00
3/09/23	JGM	Address execution of settlement agreement with Todd Almassian.	.20	100.00
3/10/23	JGM	Address status of execution of settlement agreement with Tom Bruinsma.	.20	100.00
3/13/23	JGM	Address and respond to email from Tom Bruinsma about settlement agreement (.10); email to David Saperstein, Luke Wolf and Todd Almassian about status of clients signing settlement agreement (.10); email from Luke Wolf about settlement agreement (.10); email from David Saperstein about same (.10).	.40	200.00
3/14/23	JGM	Address settlement agreement, filing of motion and obtaining signatures for settlement agreement (multiple emails concerning same).	1.00	500.00
3/15/23	JGM	Address status of settlement and follow-up email to David Saperstein about same.	.20	100.00
3/16/23	JGM	Telephone call with David Saperstein about finalizing settlement (.10), address filing and service of motion to approve settlement (.40).	.50	250.00
3/17/23	JGM	Address status of settlement (.10); review email to and from David Saperstein about same (.20).	.30	150.00
3/20/23	JGM	Email to David Saperstein about execution of settlement agreement.	.20	100.00
3/21/23	JGM	Address multiple emails from David Saperstein about executed settlement agreement (.50); advise client that have received all signatures and now ready to file motion (.10).	.60	300.00
3/22/23	JGM	Address filing of motion to approve settlement (.20); transmit fully executed settlement agreement to parties and advise about filing of motion (.20); email to David Saperstein about payment of settlement funds (.20); email to UST about filing of settlement motion (.20); address filing of motion, payment of settlement monies and W-9 request with client (.20); docket response and CNO for motion (.10).	1.10	550.00
3/22/23	KRC	Reviewed final motion document for filing with court and review of certificate of service.	.50	175.00
3/30/23	JGM	Address upcoming adjourned status conference on adversary proceeding (.20); call with Shelley at Judge Boyd's chambers upon adjourning upcoming status conference in light of filing of 9019 motion (.20), follow up call with Shelley about adjournment of status conference (.20); email to counsel about same (.20); email from David Saperstein about same (.10); review and respond to email from Luke Wolf (.10).	1.00	500.00

TOTAL PROFESSIONAL SERVICES

\$ 4,545.00

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129815

MATTER TOTAL**\$ 4,545.00****SUMMARY OF PROFESSIONAL SERVICES****SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	8.60	500.00	4,300.00
Kimberly Clayson	Of Counsel	.70	350.00	245.00
TOTALS		9.30		\$ 4,545.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/DISB

Invoice #: 6129815

RE: DISBURSEMENTS

COSTS ADVANCED

Description	Amount
3/22/23 Copying/printing	3.90
TOTAL COSTS ADVANCED	\$ 3.90
MATTER TOTAL	\$ 3.90

Taft Stettinius & Hollister

Client/Matter # TBC7BV/FEEAPP

Invoice #: 6129815

RE: FEE APPLICATIONS

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
3/13/23	JGM	Email to Tom Bruinsma about review and approval of invoice.	.10	50.00
TOTAL PROFESSIONAL SERVICES				\$ 50.00
MATTER TOTAL				\$ 50.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	.10	500.00	50.00
TOTALS		.10		\$ 50.00

April 2023



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129822

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through April 30, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	1,230.00	.00	1,230.00
CASE	CASE ADMINISTRATION	1,430.00	.00	1,430.00
Total		2,660.00	.00	2,660.00

TOTAL THIS INVOICE	\$ 2,660.00
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Client/Matter # TBC7BV/ASSETA

Invoice #: 6129822

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
4/11/23	JGM	Review and respond to emails from Jennifer Suchler about settlement motion and time for certifying same (multiple emails) (.40); review email from David Saperstein about fees incurred in March (.10); advise client of same (.10).	.60	330.00
4/11/23	KRC	Response to insurance counsel's inquiry about status of compromise motion.	.20	74.00
4/18/23	KRC	Reviewed docket to verify certification filing.	.30	111.00
4/19/23	JGM	Address need to file revised certificate of service with matrix for settlement order.	.20	110.00
4/20/23	JGM	Address entry of order approving 9019 settlement and circulate to counsel and client (.30), review email from Luke Wolf (.10).	.40	220.00
4/21/23	JGM	Review and respond to email from David Saperstein about settlement and payment thereunder (.20), email to Todd Almassian about settlement payment (.10)	.30	165.00
4/24/23	JGM	Address email and letter from David Saperstein about transmittal of settlement check.	.20	110.00
4/25/23	JGM	Review and respond to email from Thomas Bruinsma about receipt of settlement funds from insurer.	.20	110.00

TOTAL PROFESSIONAL SERVICES \$ 1,230.00

MATTER TOTAL \$ 1,230.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	1.90	550.00	1,045.00
Kimberly Clayson	Of Counsel	.50	370.00	185.00
TOTALS		2.40		\$ 1,230.00

Client/Matter # TBC7BV/CASE

Invoice #: 6129822

RE: CASE ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
4/11/23	JGM	Confer with Tom Bruinsma about administration of estate, call from creditor, settlement and payments from Sellers' chapter 11 plan (.30); pull and transmit chapter 11 plan pleadings from Mark Sellers chapter 11 to client (.50); email to Tom Bruinsma about payments under chapter 11 plan of Mark Sellers to estate (.60).	1.40	770.00
4/13/23	JGM	Preparation of proposed letter to Tom Bruinsma about administration of case (.40); email to Tom Bruinsma about same (.10); address letter with Tom (multiple calls) (.30); review, revise and transmit revised letter to Tom (.40).	1.20	660.00
TOTAL PROFESSIONAL SERVICES				\$ 1,430.00
MATTER TOTAL				\$ 1,430.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	2.60	550.00	1,430.00
TOTALS		2.60		\$ 1,430.00

May 2023



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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129823

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through May 31, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
CLAIMS	CLAIMS ADMINISTRATION	385.00	.00	385.00
Total		385.00	.00	385.00
TOTAL THIS INVOICE				\$ 385.00

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129823

RE: CLAIMS ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
5/04/23	JGM	Email to Paul Neitzel about expiration of bar date and addressing review of filed claims (.20); follow up emails about same with Paul and Chris (.20).	.40	220.00
5/05/23	JGM	Conference call with Paul Neitzel and Chris Peirce about action to be taken to review claims.	.30	165.00
TOTAL PROFESSIONAL SERVICES				\$ 385.00
MATTER TOTAL				\$ 385.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	.70	550.00	385.00
TOTALS		.70		\$ 385.00

June 2023



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023

Invoice #: 6129888

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through June 30, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETA	ASSET ANALYSIS & RECOVERY	110.00	.00	110.00
CLAIMS	CLAIMS ADMINISTRATION	7,233.00	.00	7,233.00
FEEAPP	FEE APPLICATIONS	110.00	.00	110.00
Total		7,453.00	.00	7,453.00

TOTAL THIS INVOICE **\$ 7,453.00**

Client/Matter # TBC7BV/ASSETA

Invoice #: 6129888

RE: ASSET ANALYSIS & RECOVERY

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
6/08/23	JGM	Address resolution of preference demand on Paladin Management with Tom Bruinsma (.10); email confirming same to him (.10).	.20	110.00
TOTAL PROFESSIONAL SERVICES				\$ 110.00
MATTER TOTAL				\$ 110.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	.20	550.00	110.00
TOTALS		.20		\$ 110.00

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129888

RE: CLAIMS ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
6/01/23	JGM	Address email from Chris Peirce about claims analysis and review (.10); follow up call with him about same (.20).	.30	165.00
6/08/23	JGM	Address status of claims analysis with Tom Bruinsma (.10); email to Paul Neitzel and Chris Peirce about same (.10).	.20	110.00
6/15/23	JGM	Address and consider status of claims analysis (.10); email to Chris Peirce and Paul Neitzel regarding same (.10); follow up call with Paul Neitzel about same (.20).	.40	220.00
6/20/23	JGM	Conference call with Paul Neitzel, Chris Peirce and Kim Clayson about claims review and analysis (1.0); call with Ron Gold to address claim for PPP loan (.20); address status, action to be taken and scheduling call to review claims with Tom Bruinsma (.20); address whether guaranties limited by section 506(b)(6) and effect of substantive consolidation (.20); email from Paul Neitzel to Ron Gold about PPP claim (.20).	1.80	990.00
6/20/23	KRC	Meeting with financial advisor to review claims.	1.00	370.00
6/20/23	KRC	Research regarding claims objection issues.	1.20	444.00
6/21/23	JGM	Address and consider various issues related to claims analysis and objections (1.0); review and respond to email from Ron Gold about proposed resolution of PPP claim (.20).	1.20	660.00
6/21/23	KRC	Legal analysis of claims issues for completion of claims review.	2.40	888.00
6/22/23	JGM	Address claims objections and preparation for upcoming call with Tom Bruinsma about claims objections and analysis (.50); address email from Chris Peirce about claims analysis (.20).	.70	385.00
6/23/23	JGM	Address analysis of Florida tax statutes and impact on claims analysis.	.20	110.00
6/25/23	JGM	Email to Paul Neitzel and Chris Peirce about status of claims analysis in preparation for upcoming call with client (.10); address Port St. Lucie lease and advise Kim Clayson about same (.10); address and consider analysis of Florida secured tax claim (.20).	.40	220.00
6/26/23	JGM	Review and consider emails from Chris Peirce about claims analysis and issues to be addressed (multiple emails) (.70).	.70	385.00
6/26/23	KRC	Research regarding claims allowance.	2.50	925.00
6/27/23	JGM	Address preparation for conference call with client (.20); review and revise agenda for conference call with client (.30); participate in conference call with Kim Clayson, Paul Neitzel, Chris Peirce and Thomas Bruinsma to address claims analysis and action to be taken (.80); review email to Ron Gold about reconciling PPP claim (.10).	1.40	770.00
6/27/23	KRC	Telephone conference with client and professionals review claims objections analysis.	1.00	370.00
6/27/23	KRC	Email correspondence with agenda for claims review meeting.	.30	111.00
6/28/23	JGM	Review and respond to emails from Ron Gold about resolution and amendment of claim for principal owed on PPP loan.	.20	110.00

TOTAL PROFESSIONAL SERVICES \$ 7,233.00

MATTER TOTAL \$ 7,233.00

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129888

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	7.50	550.00	4,125.00
Kimberly Clayson	Of Counsel	8.40	370.00	3,108.00
TOTALS		15.90		\$ 7,233.00

Client/Matter # TBC7BV/FEEAPP

Invoice #: 6129888

RE: FEE APPLICATIONS

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
6/22/23	JGM	Address preparation of first interim fee application.	.20	110.00
TOTAL PROFESSIONAL SERVICES				\$ 110.00
MATTER TOTAL				\$ 110.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	.20	550.00	110.00
TOTALS		.20		\$ 110.00

July 2023



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023
Invoice #: 6129890

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through July 31, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
CLAIMS	CLAIMS ADMINISTRATION	4,792.00	.00	4,792.00
FEEAPP	FEE APPLICATIONS	533.00	.00	533.00
Total		5,325.00	.00	5,325.00
TOTAL THIS INVOICE				\$ 5,325.00

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129890

RE: CLAIMS ADMINISTRATION

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
7/10/23	JGM	Address email from Chris Peirce about updated claims analysis.	.20	110.00
7/10/23	KRC	Follow up with Financial Advisor about claims review status and process.	.10	37.00
7/13/23	JGM	Review and respond to email from Chris Peirce about claims analyses and updated documents received from company.	.20	110.00
7/14/23	JGM	Review emails from Chris Peirce about updated claims analysis.	.40	220.00
7/15/23	JGM	Email to Thomas Bruinsma about information from Wisconsin taxing authority.	.10	55.00
7/16/23	JGM	Review email from client about information received from Wisconsin taxing authority (.20); follow up email to Chris Peirce about same (.10).	.30	165.00
7/19/23	JGM	Address email from Chris Peirce about claims analysis in preparation for conference call with client (.30); address status of analysis of secured claims with Kim Clayson (.30); participate in conference call with Paul Neitzel, Chris Peirce, Kim Clayson and Thomas Bruinsma about claims analysis and with Paul Hage to address proposed distribution (1.3); follow up call with Thomas Bruinsma about same (.20).	2.10	1,155.00
7/19/23	KRC	Analyzed secured claims issues for final claims review.	1.00	370.00
7/19/23	KRC	Meeting with client to review claims analysis.	1.00	370.00
7/21/23	JGM	Email to Chris Peirce about updated claims summary analysis and action to be taken (.20), review and respond to email from Chris Peirce about claims issues (.20); address contact person at State of Michigan to address claim with (.10).	.50	275.00
7/25/23	JGM	Review and respond to email from Chris Peirce about claims analysis (.40); review and revise proposed email to be sent by client to the State of Wisconsin regarding tax claim (.30).	.70	385.00
7/26/23	JGM	Review and analyze tax claims filed by the State of Michigan (1.0); advise to Heather Donald at State of Michigan about claims (.10); email to Chris Peirce about claims and additional information needed (.20).	1.30	715.00
7/27/23	JGM	Review and respond to email from Chris Peirce about State of Michigan tax claims (.20); email to Heather Donald about filed tax claims (.50).	.70	385.00
7/28/23	JGM	Review and respond to email from Heather Donald about review of State of Michigan tax claims.	.10	55.00
7/28/23	JGM	Review company files transmitted by Chris Peirce on Michigan tax claims (.30), email to Chris about same (.20); review and respond to follow up email from Chris Peirce about Swanel Beverage claim (.20).	.70	385.00

TOTAL PROFESSIONAL SERVICES \$ 4,792.00

MATTER TOTAL \$ 4,792.00

SUMMARY OF PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	7.30	550.00	4,015.00
Kimberly Clayson	Of Counsel	2.10	370.00	777.00
TOTALS		9.40		\$ 4,792.00

Client/Matter # TBC7BV/FEEAPP

Invoice #: 6129890

RE: FEE APPLICATIONS

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
7/20/23	KRC	Review of draft fee application for counsel.	.40	148.00
7/21/23	JGM	Address preparation and filing of first interim fee application with Paul Neitzel.	.10	55.00
7/24/23	JGM	Address and respond to email from Paul Neitzel about same (.10); address status and how to proceed with David Distel (.20); follow-up call with Paul Neitzel regarding claims objections (.10); review and respond to email from Chris Peirce about claims objections (.20).	.60	330.00
TOTAL PROFESSIONAL SERVICES				\$ 533.00
MATTER TOTAL				\$ 533.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Judith G. Miller	Of Counsel	.70	550.00	385.00
Kimberly Clayson	Of Counsel	.40	370.00	148.00
TOTALS		1.10		\$ 533.00

August 2023



Taft Stettinius & Hollister LLP

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FEIN#: 31-0541755

September 11, 2023
Invoice #: 6129891

Thomas Bruinsma, Chapter 7 Trustee of
 Barfly Ventures, LLC
 6812 28th Street SE
 Grand Rapids, MI 49546

INVOICE SUMMARY

Client #: TBC7BV

For professional services rendered and costs advanced through August 31, 2023:

RE: THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF

Matter #	Matter Description	Fees	Costs	Total
ASSETD	ASSET DISPOSITION	.00	23.40	23.40
CASE	CASE ADMINISTRATION	141.00	.00	141.00
CLAIMS	CLAIMS ADMINISTRATION	12,520.00	.00	12,520.00
EMP	EMPLOYMENT	444.00	7.80	451.80
FEEAPP	FEE APPLICATIONS	12,897.50	.00	12,897.50
Total		26,002.50	31.20	26,033.70

TOTAL THIS INVOICE **\$ 26,033.70**

Taft Stettinius & Hollister LLP

Client/Matter # TBC7BV/ASSETD

Invoice #: 6129891

RE: **ASSET DISPOSITION****COSTS ADVANCED**

Description	Amount
8/22/23 Copying/printing	23.40
TOTAL COSTS ADVANCED	\$ 23.40
MATTER TOTAL	\$ 23.40

Taft Stettinius & Hollister

Client/Matter # TBC7BV/CASE

Invoice #: 6129891

RE: **CASE ADMINISTRATION**
PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/18/23	LES	Conference call with Kim Clayson to discuss exhibits for Fee Application, revise Fee application with updated exhibit numbers and exhibits.	.60	141.00
TOTAL PROFESSIONAL SERVICES				\$ 141.00
MATTER TOTAL				\$ 141.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Lauren E. Sell	Paralegal	.60	235.00	141.00
TOTALS		.60		\$ 141.00

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129891

RE: CLAIMS ADMINISTRATION
PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/01/23	JGM	Address status of claims objections with Kim Clayson (.20), review follow up email from Chris Peirce about same (.10); follow up email to Heather at State of Michigan about resolving tax claims (.30).	.60	330.00
8/01/23	KRC	Draft omnibus objection to proofs of claim.	1.00	370.00
8/02/23	JGM	Address claims objections with Kim Clayson (.20); confer with Chris Peirce about preparation of reconciliation of taxes in claim as against taxes paid (.20); review email from Chris about claim objections (.20).	.60	330.00
8/08/23	JGM	Participate in conference call with Kim Clayson, Chris Peirce, Paul Neitzel and Tom Bruinsma about claims status, objections to be filed and action to be taken (.60); email to Tom Bruinsma about status of State of Michigan claims and proposed email to send to State of Wisconsin (.30); call with Ms. Gardner (State of Michigan Collections Dept.) and Chris Peirce about filed claims, resolution of claims and action to be taken (.50); review proposed cover letter to be sent to Ms. Gardner by Chris Peirce (.20).	1.60	880.00
8/08/23	KRC	Meeting with Trustee to review and confirm claims objections categories.	.80	296.00
8/09/23	JGM	Address tax claims with Tom Bruinsma and action to be taken (.20); follow up call with Tom about documentation received from State of Wisconsin (.10); email to Chris Peirce to review and to analyze documents received from State of Wisconsin (.20); review and revise proposed fax to Ms. Gardner at State of Michigan and advise Chris Peirce of same (.20).	.70	385.00
8/10/23	JGM	Review and analyze email from Chris Peirce about State of Wisconsin claim (.40); review and analyze Section 507(a)(8)(A) (.40); follow up call with Chris Peirce about treatment to be accorded the claim (.20).	1.00	550.00
8/11/23	JGM	Address and consider "Assessment date" for purposes of Wisconsin tax claim (.30); address status with Tom Bruinsma and proposed action to be taken (.20).	.50	275.00
8/15/23	MIK	Attention to bankruptcy and Wisconsin sales tax matters.	.30	160.50
8/15/23	JGM	Address and consider issues related to Wisconsin sales and use tax claim (.50); address same with Paul Neitzel (.10).	.60	330.00
8/16/23	MIK	Attention to, research and analysis regarding Wisconsin sales and use tax and assessment matters.	1.90	1,016.50
8/16/23	JGM	Address State of Wisconsin tax claim with client (.20); preparation of proposed email to client setting forth what we need from Bernie at State of Wisconsin (.20); address same with Chris Peirce (.20); transmit notice of final taxes to Milt Kovinsky to review (.10), review email from Milt Kovinsky about same (.20), follow up email to Tom about same (.10).	.80	440.00
8/17/23	JGM	Address email from Chris Peirce about information needed to address tax and Consumers Power claims (.20); review proposed form of omnibus objection to claims and provide comments to Kim Clayson (.20).	.40	220.00
8/17/23	KRC	Work on draft omnibus claim objection.	.80	296.00
8/17/23	KRC	Draft omnibus objection regarding satisfied claims.	1.00	370.00
8/21/23	JGM	Address status of omnibus objections and transmittal of same to client in advance of next call with Kim Clayson.	.20	110.00
8/21/23	KRC	Draft omnibus objection regarding satisfied claims.	1.00	370.00
8/22/23	JGM	Conference call with Kim Clayson, Chris Peirce and Paul Neitzel about claims status and objections (.80); follow up call with Kim Clayson about omnibus objection to secured lender claims (.20); conference call with Chris Peirce and Ms. Gardner (State of Michigan) about resolution of tax claims (.50); advise client about same (.10); email from Chris Peirce about resolution of State of Michigan tax claims (.20); review email to Liz (Warner Norcross) about Consumers Power claims (.20).	2.00	1,100.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/CLAIMS

Invoice #: 6129891

Date	Atty	Description Of Services Rendered	Hours	Amount
8/23/23	JGM	Address status of lender agreeing to stipulate to withdraw claims as being satisfied (.10); preparation of stipulation and order to address resolution of State of Michigan tax claims (1.5); transmit same to client to review and to approve (.10); address proposed stipulation and order to address satisfied claims of Gordon Food Service (.10).	1.80	990.00
8/24/23	JGM	Address emails relating to Gordon Foods claims (.20); preparation of letter to Department of Revenue for Wisconsin (.50); review and revise letter (.20); preparation of email to client about letter and how to proceed (.30); address comments of Kim Clayson to proposed letter (.20); review, revise and finalize letter to Wisconsin Department of Revenue (.20); address and consider issues attendant to Gordon Foods claims (.20).	1.80	990.00
8/24/23	KRC	Review and revised stipulations regarding claims and omnibus objections regarding claims.	4.80	1,776.00
8/25/23	JGM	Address email from Chris Peirce about stipulation and order with State of Michigan (.10); review and revise order and recirculate to client to review and to approve (.20); address response from State of Wisconsin with client (.10); review response and consider impact on status of limitations issues (.20); address emails about Consumers Power claims and position of new company to assume same (.20).	.80	440.00
8/30/23	JGM	Address proposed stipulation and order for State of Michigan claims and Wisconsin claims with Tom Bruinsma and Chris Peirce and action to be taken (.20); email from Kim Clayson to Tom Bruinsma about review and approval of other objections and stipulations and orders on claims (.10).	.30	165.00
8/31/23	JGM	Review and respond to email from Chris Peirce about proposed language to be placed in transmittal to Ms. Gardner; prepare and provide language to Chris (.50); email confirmation from Chris that fax sent (.10).	.60	330.00
TOTAL PROFESSIONAL SERVICES				\$ 12,520.00
MATTER TOTAL				\$ 12,520.00

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Milton I. Kovinsky	Partner	2.20	535.00	1,177.00
Judith G. Miller	Of Counsel	14.30	550.00	7,865.00
Kimberly Clayson	Of Counsel	9.40	370.00	3,478.00
TOTALS		25.90		\$ 12,520.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/EMP

Invoice #: 6129891

RE: EMPLOYMENT

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/15/23	KRC	Attention to fee application, exhibits, edits and drafting.	1.20	444.00

TOTAL PROFESSIONAL SERVICES	\$ 444.00
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COSTS ADVANCED

Description	Amount
8/17/23 Copying/printing	7.80
TOTAL COSTS ADVANCED	\$ 7.80
MATTER TOTAL	\$ 451.80

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Kimberly Clayson	Of Counsel	1.20	370.00	444.00
TOTALS		1.20		\$ 444.00

Taft Stettinius & Hollister

Client/Matter # TBC7BV/FEEAPP

Invoice #: 6129891

RE: FEE APPLICATIONS

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/10/23	JGM	Preparation of first interim fee application for Taft.	3.50	1,925.00
8/11/23	JGM	Complete preparation of first interim fee application (3.0); forward to Taft team to review (.10).	3.10	1,705.00
8/14/23	JGM	Review and revise first interim fee application (2.0); review and revise time in performas for fee application (2.5); address scheduling of meeting to review and finalize fee application and exhibits with Lauren Sell (.20); address and consider comments of Paul Hage to fee application (.20).	4.90	2,695.00
8/14/23	KRC	Reviewed and revised fee application.	1.00	370.00
8/15/23	LES	Meeting with Judy Miller and Kim Clayson to discuss draft fee application and exhibits that need to be drafted (.50), conference call with Dave Distel to discuss exhibits needed from him (.50).	1.00	235.00
8/15/23	LES	Revise Fee Application and Proposed Order with Judy's updates.	.50	117.50
8/15/23	JGM	Address and consider revisions to first interim fee application (1.0); address exhibits needed for first interim fee application (1.0); address first interim fee application with Paul Neitzel (.10); address same with Dave Distel (.10); direct Lauren Sell how to proceed with fee application (.30).	2.60	1,430.00
8/16/23	LES	Address edits to the Fee Application.	.10	23.50
8/16/23	JGM	Address first interim fee application with client (.20); review and revise first interim fee application (1.5); transmit same to Paul Neitzel with explanation of how to proceed (.30); review and respond to email from Paul Neitzel about same (.10).	1.90	1,045.00
8/17/23	JGM	Address exhibits for fee application with Lauren Sell.	.20	110.00
8/22/23	LES	Prepare exhibits for Interim Fee Application.	3.60	846.00
8/24/23	LES	Update Fee Application.	1.30	305.50
8/28/23	JGM	Review and revise time for first interim fee application for the period of May 2021 through November 2022.	2.50	1,375.00
8/29/23	JGM	Address fee applications and action to be taken (.30); review and respond to email from Chris Peirce about finalizing and filing fee applications and exhibits needed for same (.50).	.70	385.00
8/30/23	JGM	Address status of fee applications with client and Chris Peirce, timing and action to be taken in connection therewith.	.20	110.00
8/31/23	JGM	Review August performa time for interim fee application.	.40	220.00
TOTAL PROFESSIONAL SERVICES				\$ 12,897.50
MATTER TOTAL				\$ 12,897.50

SUMMARY OF PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Lauren E. Sell	Paralegal	6.50	235.00	1,527.50
Judith G. Miller	Of Counsel	20.00	550.00	11,000.00
Kimberly Clayson	Of Counsel	1.00	370.00	370.00
TOTALS		27.50		\$ 12,897.50

EXHIBIT 5
(Biographies of Taft Attorneys and Paralegals)

Kimberly Ross Clayson

SENIOR COUNSEL / DETROIT
(SOUTHFIELD), DETROIT (DOWNTOWN)
E: kclayson@taftlaw.com
T: (248) 727-1635
F: (248) 351-3082



Kim is an attorney in our Bankruptcy and Restructuring practice group. She serves a diverse client portfolio in the areas of insolvency law, creditors' rights, business law and health law. She provides counsel to operating businesses as well as to creditors of financially distressed businesses and individuals. Kim has extensive experience restructuring business debtors and representing Chapter 7 trustees in fraud investigations and bankruptcy litigation. She was appointed and presently serves as one of only five Subchapter V Trustees in the Eastern District of Michigan under the Small business Reorganization Act of 2019.

Speeches and Publications

Publications

- "Chapter 15 – Bankruptcy Adversary Proceedings," *Michigan Causes of Action Formbook (2022 Edition)*, published by ICLE.
- "Subchapter V Case Law Update," *National Association of Bankruptcy Trustees Journal*, Summer 2021 Issue.
- "Assets Wanted: Chapter 7 Trustee Panel," Hon. Stephen W. Rhodes Detroit Consumer Bankruptcy Conference, 2010.

Speaking Engagements

- Speaker, "Know Your Rights and Responsibilities Under the No Surprises Act," Decision Health Advanced Specialty Coding Compliance & Reimbursement Symposium, Pain & Anesthesia Track, 2022.
- Speaker, "Understand Your Fraud Risk: Lessons Learned From Recent Enforcement Actions," Decision Health Advanced Specialty Coding Compliance & Reimbursement Symposium, Pain & Anesthesia Track, 2022.
- Panelist, "Hot Topics in Subchapter V," Minnesota CLE Bankruptcy

Practices

Bankruptcy and Restructuring
Creditors' Rights

Industries

Health Care and Life Sciences

Education

University of Detroit Mercy School of Law
Michigan State University - James Madison College

Admissions

State - Michigan

Institute, 2022.

- Panelist, "SBRA Update," Federal Bar Association, Western District of Michigan 34th Annual Bankruptcy Section Seminar, 2022.
- Speaker, "Anti-Kickback/Stark Physician Self-Referral Update: Are the New Rules Good News for Your Practice?," Decision Health Advanced Specialty Coding Compliance & Reimbursement Symposium, Pain & Anesthesia Track, 2021.
- Speaker, "Privacy and Security Update: Keep Up With the Growing Risk for Your Practice," Decision Health Advanced Specialty Coding Compliance & Reimbursement Symposium, Pain & Anesthesia Track, 2021.
- Speaker, "Privacy and Security Update: Keep Up With the Growing Risk for Your Practice," Decision Health Billing & Compliance Summit, 2021.
- Panelist, "Subchapter V Case Law Update," Hon. Stephen W. Rhodes Detroit Consumer Bankruptcy Conference, 2021.
- Panelist, "Dealing with Co-Owners of Bankruptcy Estate Property," Hon. Stephen W. Rhodes Detroit Consumer Bankruptcy Conference, 2019.
- Webinar Presenter, "Section 523 Exceptions to Discharge Adversary Proceedings," Strafford Publications, Inc., 2019.
- Presenter, "Defining Your Exit Strategy," Lawrence Technical University Detroit Center for Design + Technology, 2018.
- Panelist, "Prosecuting & Defending §523 Adversary Proceedings," Hon. Stephen W. Rhodes Detroit Consumer Bankruptcy Conference, 2018.
- Panelist, "Fuel for Growth: Collaboration Over Competition," Techstars Startup Week Detroit, 2018.
- Panelist, "Can You AI Your Professionals Out of a Job?," Techstars Startup Week Detroit, 2018.
- Panelist, "Getting Beyond 'No': Why your Business Idea Isn't Getting Funded," Techstars Startup Week Detroit, 2018.
- Panelist, "Chapter 11 Basics for Attorneys," Hon. Stephen W. Rhodes Detroit Consumer Bankruptcy Conference, 2017.
- Panelist, "Mortgage Issues," Hon. Stephen W. Rhodes Detroit Consumer

Bankruptcy Conference, 2014.

- Presenter, "The Art of Negotiation," University of Michigan's Center for Middle Eastern and North African Studies Entrepreneurship through Empowerment Program, 2014.
- Speaker, "Bankruptcy of Detroit & Doing Business in the Region," Michigan State University Turkish Resource Center of North America US-Turkey Creative Economies Business Summit, Istanbul, Turkey, 2013.
- Panelist, "Chapter 11 Bankruptcy A 'How To' Guide," Hon. Stephen W. Rhodes Detroit Consumer Bankruptcy Conference, 2011.
- Speaker, "Legal Planning for Small Businesses," Open City Detroit, 2010.

Professional Affiliations

- American Bankruptcy Institute
Member, 2006-Current
- American Health Law Association
Member, 2022-Current
- Federal Bar Association for the Eastern District of Michigan
Member, 2006-Current
- Institute of Continuing Legal Education
Contributor
- National Association for Bankruptcy Trustees
Member, 2020-Current
- State Bar of Michigan
Member, Business Law Section
UCC Committee Co-Chair, 2022-Current
- State of Michigan Attorney Discipline Board
Hearing Panelist, 2019-Current
- Women's Law Association of Michigan
Member, Wayne Region and Tip of the Mitt Region, 2020-Current

Community Involvement

- Detroit Waldorf School
Board Member, 2010-2016
Treasurer, 2012-2014

- Outlier Media
Board Member, 2022-Current

Paul Hage

PRACTICE GROUP CO-CHAIR / PARTNER /

DETROIT (SOUTHFIELD)

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Paul is co-chair of the firm's Bankruptcy and Restructuring practice group. He specializes in representing debtors, lenders, creditors' committees, asset purchasers, unsecured creditors, and trustees in bankruptcy proceedings nationwide. Paul is also a member of the firm's Diversity & Inclusion Committee.

Paul is a Fellow in the American College of Bankruptcy and a member of the Executive Committee of the American Bankruptcy Institute. He has been an Adjunct Professor at the University of Michigan Law School and is certified by the American Board of Certification as a specialist in business bankruptcy law. He is a member of the Mediation Panel for the United States Bankruptcy Court for the Eastern District of Michigan. Additionally, Paul serves as Co-Director of the Conrad B. Duberstein National Bankruptcy Moot Court Competition, the largest single site moot court competition in the country.

Paul serves as the President of Access to Bankruptcy Court, a non-profit organization that raises funds to provide experienced bankruptcy counsel, free of charge, to low-income consumer debtors residing in the Eastern District of Michigan. Additionally, he is a member of the Board of Directors of CARE (Credit Abuse Resistance Education), a national nonprofit that provides financial literacy education to students and young adults.

Speeches and Publications

Books/Treatises

- Michigan Security Interests in Personal Property, The Institute of Continuing Legal Education (2017).
- Representing the Creditors' Committee: A Guide for Practitioners, American Bankruptcy Institute (2016).
- Credit-Bidding in Bankruptcy: A Guide for Lenders, Creditors and

Practices

Bankruptcy and Restructuring
Creditors' Rights

Education

St. John's University School of Law

Loyola University Chicago School of Law

Michigan State University, James Madison College, B.A.

Admissions

State - Michigan

Federal - U.S. Supreme Court
Federal - Western District of Michigan

Federal - Eastern District of Michigan

Federal - U.S. Court of Appeals for the Sixth Circuit

Distressed-Deb Investors, American Bankruptcy Institute (2015).

- The Bankruptcy Claims Handbook, American Bar Association (2013).
- Strategic Alternatives for Distressed Business, ThomsonReuters (2008).
- Norton Bankruptcy Law & Practice, ThomsonReuters (2008).

Articles

- “The New Michigan Uniform Assignment of Rents Act,” *The Michigan Business Law Journal* (2022).
- “Recent Developments in Section 503-Administrative Expenses,” *Norton Annual Survey of Bankruptcy Law* (2022).
- “The Great Unsettled Question: Nonconsensual Third-Party Releases Deemed Impermissible in *In re Purdue Pharma, LP*,” *American Bankruptcy Institute Journal* (2022).
- “Recent Developments in Section 503-Administrative Expenses,” *Norton Annual Survey of Bankruptcy Law* (2021).
- “Michigan Dramatically Expands Existing Receivership Law with the Enactment of The Receivership Act,” *The Michigan Business Law Journal* (2021).
- “Ten Years Later, Access to Bankruptcy Court Has Never Been More Important,” *The Michigan Business Law Journal* (2021).
- “City of Chicago v. Fulton: Supreme Court Rules that Passive Retention of Estate Property Does Not Violate the Automatic Stay,” *Journal of Bankruptcy Law & Practice* (2021).
- “Recent Developments in Section 503-Administrative Expenses,” *Norton Annual Survey of Bankruptcy Law* (2020).
- “The Next Wave of PPP Litigation: Use of PPP Funds in Chapter 11,” *Norton Bankruptcy Law Adviser* (2020).
- “The Nuts & Bolts of the Structured Dismissal of a Chapter 11 Case,” *American Bankruptcy Institute Journal* (2020).
- “The New Small Business Bankruptcy Law: What You Need to Know,” *The Michigan Business Law Journal* (2019).

- “Benchnotes: Eleventh Circuit Highlights Difficulty of Obtaining Sanctions for Discharge Violations Post-Taggart,” *American Bankruptcy Institute Journal* (2019).
- “Border Control: The Enforceability of Contractual Restraints on Bankruptcy Filings,” *ABA Business Law Today* (2019).
- “Still the Same: Direct Payments In Chapter 13 Are “Payments Under the Plan,” *Norton Bankruptcy Adviser* (2019).
- “You Never Give Me Your Money: Tenancy By the Entireties in Michigan,” *The Michigan Business Law Journal* (2019).
- “Benchnotes: First Circuit Addresses BAPCPA Stay Termination for Repeat Filers,” *American Bankruptcy Institute Institute Journal* (2019).
- “Benchnotes: Second Circuit Affirms Dismissal of Involuntary Bankruptcy Involving Two-Party Dispute,” *American Bankruptcy Institute Journal* (2018).
- “Recent Developments in Section 503-Administrative Expenses,” *Norton Annual Survey of Bankruptcy Law* (2018).
- “Benchnotes: Purchase of Unsecured Claims to Defeat Confirmation Does Not Constitute Bad Faith,” *American Bankruptcy Institute Journal* (2018).
- “The New Michigan Domestic Asset Protection Trust Statute and its Impact on Fraudulent Transfer Law,” *The Michigan Business Law Journal* (2018).
- “Benchnotes: Statutory Commission for Chapter 7 Trustees Must be Awarded Absent Exceptional Circumstances,” *American Bankruptcy Institute Journal* (2018).
- “Benchnotes: Eleventh Circuit Adopts Totality of Circumstances Standard for Judicial Estoppel.” *American Bankruptcy Institute Journal* (2018).
- “Benchnotes: Ninth Circuit Holds that a Sale Under 363(f) Strips Tenants of their 365(h) Rights,” *American Bankruptcy Institute Journal* (2017).
- “Physical Possession of Goods is Required for an Administrative Expense Under Section 503(b)(9),” *ABI Unsecured Trade Creditors Committee Newsletter* (2017).
- “Recent Developments in Section 503- Administrative Expenses & Key

Employee Retention, Incentive and Severance Plans," *Norton Annual Survey of Bankruptcy Law* (2017).

- "Sixth Circuit Court of Appeals holds That A Perfected Assignment of Rents Enforced Pre-Petition Excludes Such Rents From Being Property of the Bankruptcy of the Bankruptcy Estate," *The Michigan Business Law Journal* (2017).
- "Benchnotes: Bankruptcy Courts Lack Constitutional Authority to Approve Third-Party Releases," *American Bankruptcy Institute Journal* (2017).
- "Benchnotes: Sixth Circuit Addresses Good Faith and Mere Conduit Fraudulent Transfer Defenses," *American Bankruptcy Institute Journal* (2017).
- "Benchnotes: Ninth Circuit Extends Barton Doctrine to Unsecured Creditor Committee Members," *American Bankruptcy Institute Journal* (2017).
- "Benchnotes: Ninth Circuit Holds That Costs of Juvenile Detention Can be Discharged," *American Bankruptcy Institute Journal* (2016).
- "Recent Developments in Section 503-Administrative Expenses & Key Employee Retention, Incentive and Severance Plans," *Norton Annual Survey of Bankruptcy Law* (2016).
- "Benchnotes: Circuit Split on Dischargeability of Tax Debts on Late-Filed Returns," *American Bankruptcy Institute Journal* (2016).
- "Benchnotes: Seventh Circuit Holds that \$10,000 Book of Mormon Bible is an Exempt Asset," *American Bankruptcy Institute Journal* (2016).
- "Benchnotes: Third Circuit Weighs Factors for Granting a Stay Pending Appeal," *American Bankruptcy Institute Journal* (2016).
- "Benchnotes: Sixth Circuit Holds That Substantial Contribution Claims are Available in Chapter 7," *American Bankruptcy Institute Journal* (2015).
- "Recent Developments in Section 503-Administrative Expenses," *Norton Annual Survey of Bankruptcy Law* (2015).
- "Benchnotes: Tenth Circuit Rules that Recharacterization Remedy Survives Recent Rulings," *American Bankruptcy Institute Journal* (2015).
- "Strike Two: First Circuit Affirms Lower Court's Ruling that Puerto Rico's Municipal Restructuring Law is Unconstitutional," *American Bankruptcy*

Institute Journal (2015).

- “Benchnotes: Fifth Circuit Rejects Retrospective “Actual Benefit” Standard for Reviewing Attorney Fees,” *American Bankruptcy Institute Journal* (2015).
- “Benchnotes: Victory Through Application of ‘Hypothetical’ Test in Trump Entertainment Bankruptcy,” *American Bankruptcy Institute Journal* (2015).
- “Benchnotes: Mistakenly Filed Termination Statement is Effective to Terminate Security Interest in \$1.5 Billion Loan,” *American Bankruptcy Institute Journal* (2015).
- “Benchnotes: Courts Lack Jurisdiction to Determine Tax Refund Claims Brought by Liquidating Trustees,” *American Bankruptcy Institute Journal* (2015).
- “Not for Sale” An Approach to the Approval of Chapter 7 Discharge Settlements by Trustees,” *American Bankruptcy Institute Journal* (2014).
- “Benchnotes: Sixth Circuit Clarifies Standard for When a Cause of Action Becomes Property of the Estate,” *American Bankruptcy Institute Journal* (2014).
- “Recent Developments in Section 503 – Administrative Expenses & Key Employee Retention, Incentive and Severance Plans,” *Norton Annual Survey of Bankruptcy Law* (2014).
- “Is the Unfinished Business Rule Finished? Recent Decisions May Close the Book on Hourly Matters,” *American Bankruptcy Institute Journal* (2014).
- “Benchnotes: Eighth Circuit Addresses Subsequent New Value Defense in Tri-Party Relationships,” *American Bankruptcy Institute Journal* (2014).
- “Benchnotes: Fisker Court Limits Secured Creditor’s Right to Credit Bid,” *American Bankruptcy Institute Journal* (2014).
- “When the Third Circuit Speaks, Trade Creditors Should Listen: Takeaways on Subsequent New Value from *In re Friedman’s*,” *NACM Business Credit* (2014).
- “Benchnotes: Third Circuit Clarifies Impact of Section 502(d) on Claims Trading in *In re KB Toys, Inc.*,” *American Bankruptcy Institute Journal* (2014).

- "Retooling for Chapter 9: How is Chapter 9 Different from Chapter 11?," *The Journal of Corporate Renewal* (2013).
- "Benchnotes: Litigants Cannot Consent to a Bankruptcy Court Determining Matters for Which They Lack Constitutional Authority," *American Bankruptcy Institute Journal* (2013).
- "The Belly of the Beast: Law Firm Insolvencies, Unfinished Business and Jewel-Waivers," *ABA Business Law Today* (2013).
- "Recent Developments in Section 503 – Administrative Expenses & Key Employee Retention, Incentive and Severance Plans," *Norton Annual Survey of Bankruptcy Law* (2013).
- "A Guide to Chapter 9 of the Bankruptcy Code: What You Need to Know," *Crain's Detroit Business* (2013).
- "Benchnotes: Ninth Circuit Creates Circuit Split Regarding Whether the Holder of an Unstayed State Court Judgment Can be a Petitioning Creditor in an Involuntary Case," *American Bankruptcy Institute Journal* (2013).
- "The (Heightened) Requirements for Chapter 7 Trustees to Retain Their Own Law Firms as Counsel," *American Bankruptcy Institute Journal* (2013).
- "Coming Soon to a State Near You: What You Should Know About the New Revisions to Article 9," *American Bankruptcy Institute Journal* (2013).
- "Benchnotes: Statutory Cap on Lease Termination Claims Does Not Preclude Additional Claims by a Landlord for Maintenance and Repair Damages," *American Bankruptcy Institute Journal* (2013).
- "*In re Tousa*: When Can Indirect Benefits Constitute Reasonably Equivalent Value in Fraudulent Transfer Actions?" *The Michigan Business Law Journal* (2013).
- "Benchnotes: California Bankruptcy Court Analyzes Eligibility Requirements to be a Chapter 9 Debtor," *American Bankruptcy Institute Journal* (2013).
- "Res Judicata Bars Avoidance Actions Against Estate Professionals Where Pre-Petition Transfers Are Properly Disclosed," *American Bankruptcy Institute Journal* (2012).

- "You Can't Take Them With You: Coudert Brothers and the Application of the Unfinished Business Rule to Dissolved Law Firms," *American Bankruptcy Institute Journal* (2012).
- "Recent Developments in Section 503 – Administrative Expenses," *Norton Annual Survey of Bankruptcy Law* (2012).
- "What Can Your Operating Agreement Do For You?: Navigating Through the Intersection of Bankruptcy & LLC Law," *American Bankruptcy Institute Journal* (2012).
- "Who Is A "Transferee" Under Section 550(a) of the Bankruptcy Code?: The Divide Over Dominion, Control and Good Faith in Applying the Mere Conduit Defense," *Journal of Bankruptcy Law & Practice* (2012).
- "Recent Developments in Section 503 – Administrative Expenses," *Norton Annual Survey of Bankruptcy Law* (2011).
- "If You Build It... What You Should Know About Mechanic's Liens in Bankruptcy," *American Bankruptcy Institute Journal* (2011).
- "When Timing is Everything: Treatment of Consignment Agreements in Bankruptcy," *ABI Unsecured Trade Creditors Committee Newsletter* (2011).
- "The Delphi Preference Actions: An Abuse of the Civil Procedure Rules," *Turnaround Management Association Michigan Chapter Newsletter* (2011).
- "State Courts have Jurisdiction to Interpret § 363 Sales Orders, Enforce Implied Restrictive Covenants," *American Bankruptcy Institute Journal* (2011).
- "A Hot Issue – Does Electricity Constitute "Goods" Under the Bankruptcy Code?" *Journal of Bankruptcy Law & Practice* (2011).
- "A Split in the Case Law: Does BAPCPA's Small-Dollar Venue Restriction Apply to Preference Actions," *American Bankruptcy Institute Journal* (2010).
- "Is it Still New Value? – Application of Section 503(b)(9) to the Subsequent New Value Preference Defense," *Journal of Bankruptcy Law & Practice* (2010).
- "Recent Developments in Section 503 – Administrative Expenses,"

Norton Annual Survey of Bankruptcy Law (2010).

- “Does Section 502(d) Apply to Administrative Expenses? – The Second Circuit Joins the Debate In re Ames Stores,” *Journal of Bankruptcy Law & Practice* (2009).
- Recent Developments in Section 503—Allowance of Administrative Expenses,” *Norton Annual Survey of Bankruptcy Law* (2009).
- “Of Claims, Planes & Automobiles—Recent Developments on 503(b)(9) and Reclamation Claims,” *ABA Section of Business Law Business Bankruptcy Newsletter* (2009).
- “Recent Developments in Section 503—Allowance of Administrative Expenses,” *Norton Annual Survey of Bankruptcy Law* (2008).
- “A Primer on BAPCPA’s Small Business Bankruptcy Provisions” *Norton Bankruptcy Law Adviser* (2007).
- “Key Employee Retention Plans Under BAPCPA: Is There Anything Left?” *Journal of Bankruptcy Law & Practice* (2007).
- “Small Business Provisions Under BAPCPA,” *Journal of Bankruptcy Law & Practice* (2007).

Speaking Engagements

- Crypto and Bankruptcy: Where We Are and Where We Are Going,” Minnesota Bankruptcy Institute (2023).
- “I Knew That Stuff Was Fake: Crypto Redux,” Federal Bar Association Western District of Michigan Bankruptcy Seminar (2023).
- “The New Michigan Uniform Assignment of Rents Act,” State Bar of Michigan Webinar (2022).
- “Third-Party Releases in Chapter 11 Bankruptcy,” Seventy-Sixth Judicial Conference of the Sixth Circuit (2022).
- “Circuit Splits: Split Open and Melt,” Federal Bar Association Western District of Michigan Bankruptcy Seminar (2022).
- “Equitable Mootness: What Should the Law Be?” American Bankruptcy Institute Annual Spring Meeting (2022).
- “All Things Bankruptcy Legislative Update,” ABI Hon. Steven W. Rhodes

Consumer Bankruptcy Conference (2021).

- “Receiverships,” Federal Bar Association Western District of Michigan Bankruptcy Section Seminar (2021).
- “The New Normal in the Bankruptcy Court,” Federal Bar Association Eastern District of Michigan Webinar (2021).
- “Lessons Learned: The Demise of Art Van and Loves Furniture,” Turnaround Management Association Webinar (2021).
- “Barfly Ventures Bankruptcy: A Case Study,” Turnaround Management Association Webinar (2021).
- “Hot Topics with Bill Rochelle,” American Bankruptcy Institute Winter Leadership Conference (2020).
- “Michigan’s ‘New Expanded’ Receivership Act,” State Bar of Michigan Debtor/Creditors Rights Committee (2020).
- “Chapter 11 in the Era of COVID-19,” Federal Bar Association Western District of Michigan Bankruptcy Section Seminar (2020).
- “Insolvency Issues In the Wake of COVID-19 and The Cares Act,” Federal Bar Association Eastern District of Michigan Webinar (2020).
- “A Deep Dive on Important Bankruptcy Cases,” ABI Hon. Steven W. Rhodes Consumer Bankruptcy Conference (2019).
- “Eye on Bankruptcy,” American Bankruptcy Institute Webinar (2019).
- “Enigmatic Exemptions Explained,” Federal Bar Association Western District of Michigan Bankruptcy Section Seminar (2019).
- “Tempnology: Trademark Agreements and the Consequences of Rejection,” American Bankruptcy Institute Webinar (2019).
- “Assume? Reject? Assign? Ride Through? Jump Around?,” Federal Bar Association Western District of Michigan Bankruptcy Section Seminar (2018).
- “The Tightrope Walk of Asset Protection Planning,” MICPA Management Information and Business Conference (2018).
- “Getting Paid and Avoiding Disgorgement,” American Bankruptcy Institute Central States Bankruptcy Workshop (2018).

- "Contracting Away the Code: The Enforceability of Pre-Bankruptcy Agreements," ABA Business Law Section Spring Meeting (2018).
- "Advanced Chapter 11 Issues," Federal Bar Association Western District of Michigan Bankruptcy Section Seminar (2017).
- "Energy Case Studies," ABI Central States Bankruptcy Workshop (2017).
- "Bankruptcy Fundamentals," Consumer Bankruptcy Association (2017).
- "The New Michigan Domestic Asset Protection Trust Act," State Bar of Michigan Debtor/Creditors Rights Committee (2017).
- "Discharging 'Unknown' Claims," Annual Conference of the National Conference of Bankruptcy Judges (2016).
- "Recent Developments in 363 Sales," Norton Bankruptcy Litigation Institute – Las Vegas (2016).
- "Litigation of Professional Fees in Bankruptcy," Norton Bankruptcy Litigation Institute – Las Vegas (2016).
- "Current Issues Regarding Objections to Discharge in Chapter 7 Cases," ABI Detroit Consumer Bankruptcy Conference (2015).
- "Not for Profit and Religious Related Bankruptcies," ABI Midwestern Bankruptcy Institute (2015).
- "Loan-to-Own and Other § 363 Bidding and Acquisition Strategies," ABI Central States Bankruptcy Workshop (2015).
- "Is There a Need for Venue Reform in Chapter 11?" ABI Unsecured Trade Creditors Committee Teleseminar (2015).
- "Supreme Court Case Law Update," ABI Memphis Consumer Bankruptcy Conference (2015).
- "Supreme Court Consumer Bankruptcy Decisions," ABI Media Teleconference (2015).
- "The Legal Fight for the Future of Detroit," Turnaround Management Association Spring Conference (2015).
- "One City at a Time: The Role and Increasing Presence of Chapter 9 Municipal Bankruptcies," Campbell University Law School Symposium (2014).

- “(Almost) Everything You Wanted to Know About....Executory Contracts,” Annual Conference of the National Conference of Bankruptcy Judges (2014).
- “Bankruptcy 101,” Michigan Chapter of the Turnaround Management Association (2014).
- “Municipal Bankruptcy and Recent Developments in Chapter 9,” Norton Institutes Western Mountains Bankruptcy Law Seminar (2014).
- “Non-Profit Chapter 11’s,” Norton Institutes Western Mountains Bankruptcy Law Seminar (2014).
- “The Intricacies of Section 363 Sales,” ABI Central States Bankruptcy Workshop (2014).
- “Supreme and Appellate Court Case Law Update,” ABI Memphis Consumer Bankruptcy Conference (2014).
- “Fisker and Free Lance-Star-Anomalies or Signs of a Trend?,” ABI Unsecured Trade Creditors Committee Webinar (2013).
- “Chapter 9: The Detroit Case,” TMA Great Lakes Regional Conference (2014).
- “Representing Creditors in Wilmington and Manhattan: An Outsider’s Primer to Litigating in American’s Busiest Bankruptcy Courts,” ABI Live Webinar (2014).
- “Live to Negotiate Another Day,” Turnaround Management Association Senate Conference (2014).
- “The Impact of Section 503(b)(9) on the Subsequent New Value Preference Defense,” ABI Unsecured Trade Creditors Committee Teleseminar (2013).
- “*Stern v. Marshall*: How the Circuit Courts Have Interpreted It,” ABI Memphis Consumer Bankruptcy Conference (2013).
- “All That You Can’t Leave Behind: Law Firm Insolvencies, the Unfinished Business Rule and its Impact on Business Lawyers,” ABA Business Law Section Spring Meeting (2013).
- “Substantive Consolidation of Bankruptcy Cases: An Overview,” Norton Bankruptcy Litigation Institute – Las Vegas (2013).

- "Recent Developments in Preference Litigation," Norton Bankruptcy Litigation Institute – Las Vegas (2013).
- "Fraudulent Transfer Law: Should it Be Changed?," Debtor/Creditors' Rights Committee of the State Bar of Michigan Business Law Section (2013).
- "Tropical Storm TOUSA: Has the 11th Circuit Burst Lending to Distressed Borrowers on the Bubble?," Annual Conference of the National Conference of Bankruptcy Judges (2012).
- "Examining Litigation Surrounding the Dissolution of a Distressed Law Firm," American Bankruptcy Institute Podcast (2012).
- "Stern v. Marshall: The Current State of Bankruptcy Court Jurisdiction," West Legal Ed Teleseminar (2012).
- "Section 503(b)(9) and its Impact on the Subsequent New Value Defense," West Legal Ed Teleseminar (2012).
- "Claims Litigation in Bankruptcy Cases," West Legal Ed Teleseminar (2012).
- "Recent Developments in Claims & Preference Litigation," Norton Bankruptcy Litigation Institute – Las Vegas (2012).
- "Bankruptcy Jurisdiction, Withdrawal & Abstention," ICLE Basic Litigation in Bankruptcy Court Seminar (2012).
- "Goldilocks and the Three Fraudulent Transfer Defenses: Can Good Faith, Mere Conduit or In Pari Delicto be the Perfect Size?" National CLE Conference in Snowmass, Colorado (2012).
- "Everything You Prefer to Avoid: What You Really Should Know About Fraudulent Transfers, Preferences and Avoidance Actions," Annual Conference of the National Conference of Bankruptcy Judges (2011).
- "Iqbal & Twombly: Application of the Heightened Pleading Standard in Bankruptcy Adversary Proceedings," National CLE Conference in Vail Colorado (2011).
- "Bankruptcy & Reorganization: What You Need to Know," Michigan Association of Certified Public Accountants 2010 Automotive Dealers, Construction Industry and Controllership Conference (2010).
- "Bankruptcy Pleading Standards After Twombly and Iqbal,"

Debtor/Creditors' Rights Committee of the State Bar of Michigan
Business Law Section (2010).

- "Representing Unsecured Creditors' Committees," Michigan Chapter of the Turnaround Management Association (2010).

Awards

- Recipient, American Bankruptcy Institute 40 Under 40 Award (2017)
- Recipient, American Bankruptcy Institute Committee Leader of the Year (2017)
- Recipient, American Bankruptcy Law Journal Award (2007)
- Recipient, American Bar Association Business Bankruptcy Committee Kathryn R. Heidt Award (2013)
- Recipient, Federal Bar Association for the Eastern District of Michigan Chapter Recognition Award (2022)
- Honoree, DBusiness *Top Young Lawyer* (2013)
- Honoree, DBusiness *Top Lawyers* (2013, 2015, 2016, 2018, 2020)
- Honoree, Michigan Lawyers Weekly, *Up & Coming Lawyer* (2011)
- Honoree, Michigan *Super Lawyers*, Bankruptcy: Business (2013 – present)
- Honoree, Michigan *Super Lawyers* Rising Stars (2011 – 2012)

Professional Affiliations

- American Bankruptcy Institute
Executive Committee and Secretary, 2022-present
Board of Directors, 2019-present
American Bankruptcy Institute Journal; Executive Editor,
2020-present; Coordinating Editor, 2012-2019
ABI Unsecured Trade Creditors Committee; Co-Chair, 2015-2017;
Education Director, 2014-2015; Newsletter Editor, 2012-2014
ABI Emerging Industries & Technology Committee; Education
Director, 2017-2019
Shapero Cup Regional Moot Court Competition & Symposium;
Planning Committee, 2019-present
Strategic Planning Taskforce, 2018-2019
Volo Circuit Court Opinion First Responder; Editorial Board,
2010-2016
- American Bankruptcy Law Journal
Member, Editorial Advisory Board, 2017-2019

Chair, National Conference of Bankruptcy Judges Symposium Committee, 2019

- American Bar Association Business Law Section, Business Bankruptcy Committee
 - Co-Chair, Claims & Priorities Subcommittee, 2011-present
 - Vice-Chair, Abuses of the Bankruptcy Process Subcommittee, 2009-2011
- American Board of Certification of Bankruptcy and Creditors' Rights Attorneys
 - Board of Directors, 2019-present
- American College of Bankruptcy
 - Fellow, 2022-present
 - Diversity Equity & Inclusion Committee, 2023-present
- American Law Institute
 - Member, 2019-present
- Credit Abuse Resistance Education (CARE)
 - Board of Directors, 2022-present
 - Development Committee, 2022-present
- Consumer Bankruptcy Association
 - Member, 2018-present
- Federal Bar Association for the Eastern District of Michigan
 - Board of Directors, 2023-present
 - Co-Chair, Bankruptcy Committee, 2021-present
 - Barbara J. Rom Award for Bankruptcy Excellence Selection Committee, 2019-present
 - Western District of Michigan Bankruptcy Seminar Planning Committee, 2019-present
- Mediation Panel for the United States Bankruptcy Court for the Eastern District of Michigan
 - Member, 2021-present
- National Conference of Bankruptcy Judges
 - Education Committee, 2021-2022
- Norton Institutes on Bankruptcy Law
 - Contributing Editor, Norton Annual Survey of Bankruptcy Law, 2008-present
 - Editorial Advisory Board, Norton Bankruptcy Law Adviser, 2018-present
 - Contributing Editor, Norton Bankruptcy Law & Practice 3d Treatise, 2007-present
 - Editorial Advisory Board, Norton Journal of Bankruptcy Law &

Practice, 2010-present

- Pro Se Bankruptcy Assistance Project d/b/a Access to Bankruptcy Court
 - President, 2019-present
 - Secretary, 2016-2019
- State Bar of Michigan
 - Vice-Chair, Business Law Section Debtor/Creditor Rights Committee, 2016-present
- Turnaround Management Association
 - Michigan Chapter President, 2013-2014
 - Michigan Chapter Board of Directors, 2010-2016
 - TMA Global NextGen Leadership Committee, 2013-2014

Milton I. Kovinsky

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Milton is a partner in our Tax practice group. He counsels individuals and businesses in federal, state, and local tax matters. He advises clients on planning and structuring transactions, including acquisitions, Section 1031 like-kind exchanges, restructurings, and dispositions. His breadth of expertise includes advising on state income tax, franchise tax, and sales and use tax matters. He also works closely with attorneys in our Real Estate and Mergers and Acquisitions practice groups to structure creative, comprehensive tax solutions to our clients' wide-ranging business needs.

Practices

Tax

Transactional Tax and Tax Planning

State and Local Tax

Personal Tax Planning

Education

New York University School of Law

Northwestern University School of Law

University of Michigan

Admissions

State - Michigan

State - Illinois

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Notable Matters

- Represented clients in dozens of Section 1031 like-kind exchanges, both forward and reverse 1031 exchanges, involving various, complex partnership tax and other issues.
- Represented clients in appealing state and local income tax and sales and use tax assessments.
- Represented businesses and owners in structuring transactions for the most business effective solutions and to minimize federal, state and local taxes.

Speeches and Publications

- ?The Michigan Business Tax, Foreclosures and Personal Liability,? 37 Michigan Real Property Review 78 (2010)

Professional Affiliations

- State Bar of Michigan, Member, Section of Taxation
- American Bar Association Section of Taxation, Member
- Illinois Bar Association, Member

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Eric A. Linden

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Eric is a partner in Taft's Commercial Litigation, Electronic Payments, and Environmental practice groups. His experience encompasses a broad range of business disputes with a particular emphasis on contract disputes, non-competition agreements, trade secret litigation, tortious interference, electronic payment disputes, and litigation concerning breaches of fiduciary duty.

Eric provides sophisticated insight into the legal and practical challenges faced by businesses each day and works to secure the best solution for them in the most expeditious, cost-effective manner. He is an experienced litigator who has achieved favorable outcomes for his clients both inside the courtroom and across the negotiation table. He provides sound advice on the risks and benefits of a course of action to ensure that his client is best prepared to make some of their most significant decisions in some of the most complex and highly regulated areas of the law.

From 1981-1982, Eric served as a judicial law clerk to the Hon. Cornelia Kennedy in the U.S. Court of Appeals for the Sixth Circuit.

Notable Matters

Recent Representative Electronic Payments Transactions

- Representation of a regional ISO in connection with a litigation matter pending in Michigan with one of its agents over the accuracy of the calculation of residual payments.
- Representation of a regional ISO in connection with litigation pending in California concerning enforcement of a liquidated damage provision in its agent agreement for an agent, which solicited and moved merchants in violation of the agreement.
- Successful representation of an ISO in Florida litigation with one of its sales representatives concerning the payments to which the sales representative was entitled when the ISO sold its portfolio, including the

Practices

Commercial Litigation

Environmental

Paytech and Payment Systems

Industries

Electronic Payments

Education

University of Michigan Law School

Brandeis University

Admissions

State - Michigan

State - Florida

agent's merchants, to a larger company.

- Successful representation of a regional ISO in litigation in Pennsylvania concerning alleged violations of the Electronic Funds Transfer Act concerning an ACH debit applied against a merchant's account.
- Consultation and advice to a regional ISO concerning interpretation and implementation of a merchant agreement provision concerning the establishment and maintenance of a reserve account for a high-risk merchant.
- Appeal of a compliance assessment imposed by a card brand when a foreign bank suffered losses when the ISO's merchant's system was hacked.
- Successful representation of regional ISO in connection with negotiation and resolution of a significant early termination fee against large merchant.

Other Recent Matters

- Representation of insurance reconstruction contractor against lender, owner, and insurance company in litigation pending in South Carolina concerning the proper allocation of insurance proceeds paid by insurer for covered loss.
- Representation of a multi-specialty physician group against claims by former shareholders of minority oppression and breach of fiduciary duty.
- Representation of successor corporation against claims by former shareholder concerning a look-back provision in stock redemption.
- Successful arbitration against independent contractor for breach of contract concerning inadequate consultation services.
- Representation of law firm and its principals against claims of former shareholder, including obtaining partial summary disposition of several claims.
- Successful representation of insurance reconstruction contractor in litigation in Florida resulting in a judgment after trial in excess of \$10 million.
- Consultation, advice, and representation of insurance reconstruction contractor in various bankruptcy courts around the country concerning the

entitlement to insurance proceeds assigned to contractor pre-petition and therefore not part of the bankruptcy estate.

Awards

- Honoree, Dbusiness Top Lawyer (2012, 2020)

Professional Affiliations

- State Bar of Michigan
Member
- Florida Bar Association
Member
- Electronic Transactions Association
Member
- Environmental Law Society
Member

Community Involvement

- Brandeis University Alumni Association
Member
- Rudgate Associates Homeowners' Association
President

Emily M. Mayer

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Emily is a partner in Taft's Commercial Litigation, Insurance Recovery, and Appellate practice groups. She represents businesses and individuals in all areas of commercial litigation, including membership, partnership, and shareholder disputes, contract disputes, restrictive covenants, and business torts.

Emily works with her clients to understand precisely the resolution they seek and then develops a specific strategy tailored to achieve that desired outcome, which can range from filing suit or asserting counterclaims to defending lawsuits with the goal of minimizing potential liability and expense. She has achieved successful outcomes and favorable settlements for her clients at trial and on appeal, as well as through dispositive motion practice, mediation, and negotiation.

Notable Matters

- First-chaired a multi-day trial regarding ownership of commercial property and obtained judgment in client's favor on all claims and counterclaims.
- Briefed legally significant member oppression issue for the Michigan Supreme Court, resulting in a favorable ruling.
- Successfully obtained temporary restraining orders and preliminary injunctions for violations of non-competition agreements and other restrictive covenants.

Speeches and Publications

- "Uncertainty Abounds. The Joint Employer Doctrine and the Franchise Business Model," *Michigan Bar Journal* (May 2017)
- Michigan Business Network Radio interview: Hiring Employees in Canada (August 2015)

Awards

Practices

Appellate

Commercial Litigation

Insurance Recovery

Industries

Automotive

Education

Wayne State University Law School

University of Michigan

Admissions

State - Michigan

- Honoree, *Best Lawyers® "Ones to Watch"* (2021 – present)
- Honoree, Michigan *Super Lawyers Rising Stars*, Business Litigation (2018 – 2022)
- "Up and Coming" Lawyer, *Michigan Lawyers Weekly* (2021)

Professional Affiliations

- State Bar of Michigan
Member
- Oakland County Bar Association
Member

Community Involvement

- Academy of the Sacred Heart
Chair, Board of Trustees
Past President, Alumnae Board

Judith Greenstone Miller

Senior Counsel / Detroit (Southfield)



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Judy is an attorney in our Bankruptcy and Restructuring and Privacy and Data Security practice groups. She specializes in bankruptcy, insolvency, creditors' rights and commercial litigation. Her practice involves representing debtors, secured and unsecured creditors, creditors' committees, and trustees in bankruptcy proceedings, primarily involving Chapter 11 reorganizations. Judy also represents parties in litigation in complex commercial disputes. She has testified numerous times on pending bankruptcy legislation before the National Bankruptcy Review Commission, the Judiciary Committees of the United States House of Representatives, and the United States Senate. Judy is a frequent lecturer nationally and has authored and co-authored many articles on bankruptcy law and procedure, revised Article 9 of the Uniform Commercial Code, and state law creditor rights issues, including receiverships and domestic asset protection trusts.

Practices

Bankruptcy and Restructuring

Commercial Litigation

Arbitration and Mediation

Education

Wayne State University Law School

University of Michigan

Admissions

State - Michigan

Federal - U.S. District Court for the Eastern District of Michigan

Federal - U.S. District Court for the Western District of Michigan

Federal - U.S. Court of Appeals for the Sixth Circuit

Notable Matters

- Reported decision in *In re Trident Associates, L.P.*, 53 F.3d 127 (6th Cir. 1995).

Speeches and Publications

Publications

- Co-Author, The New Small Business Bankruptcy Law: What You Need to Know, " *Mich.Bus.L.J.* (Fall 2019).
- "The New Michigan Commercial Real Estate Receivership Act," (May 2018).
- "The New Michigan Domestic Asset Protection Trust Statute and Its Impact on Fraudulent Transfer Law," *38 Mich.Bus.L.J.* 24 (Spring 2018).
- "The New Michigan Domestic Asset Protection Trust Statute," (October 2017).
- "The Sixth Circuit Court of Appeals Holds That a Perfected Assignment of Rents Enforced Pre-Petition Excludes Such Rents From Being Property of the Bankruptcy Estate," *37 Mich.Bus.L.J.* 37 (Spring 2017).
- "The FTC's Expansive 'Watch Dog' Role in Questions – How Business Should Respond," (2017).
- "New Ruling by U. S. Supreme Court on Standing to Pursue Litigation – Alleging a 'Mere Statutory Violation' Is Not Sufficient to Confer Article III Standing for a Federal Cause of Action," *36 Mich.Bus.L.J.* 39 (2016).
- "Summary of Powers of an Emergency Manager Under Public Act 436." (July 2014).
- "Summary of Options for Local Governments Determined to be in a Financial Emergency to Elect Under Michigan Public Act 436," (July 2014).
- "A Guide to Chapter 9 of the Bankruptcy Code: What You Need to Know," (2013).
- "The Constriction of Bankruptcy Court Jurisdiction: The Limitations of Post-Confirmation Jurisdiction and Impediments to Pursuing Causes of Action." (2012).
- "Of Claims, Planes and Automobiles — Recent Developments on Section 503(b)(9) and Reclamation Claims," *American Bar Association Newsletter* (2009).
- "503(b)(9) Claimants-The New Constituent, A.K.A 'The 500 Pound Gorilla' at the Table," *DePaul Bus. & Comm.L.J.*, Vol. 5, No. 3 (2007).
- "Waivers of Automatic Stay: Are They Enforceable," *Real Property, Probate and Trust Journal*, Vol. 41, Number 2 (2006).
- "Protecting Professional Fees From Disgorgement: Obtain Carve-Outs From Secured Creditors to Safeguard Against Uncertainties," *American Bankruptcy Institute Journal*, Vol. XXV, No. 5 and No. 6 (2006).
- "Lenders Best Practices, Rights and Remedies, Michigan Special Tools and Mold Lien Act," (February 2005).
- "The Plan of Reorganization: A Thing of the Past: Pushing the Envelope in Liquidation of the Estate: Reexamining Sections 363 and 365 of the Bankruptcy Code," *Journal of Bankruptcy Law and Practice*, Vol. 13 (August 2004).
- "The Ultimate Garage Sale – Disposing of a Troubled Company," *Business Law Today*, Vol. 14, No. 1, pg. 11 (Sept./Oct. 2004).
- "Waivers of Automatic Stay," *26 Mich. Real Property Review* 195 (2000).
- "U.S. Supreme Court Rules on "New Value" or Does It?," *26 Mich. Real Property Review* 67 (1999).
- "Sales of Real Estate and Other Property of Bankruptcy Estates Under the Revised Local Bankruptcy

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Rules of the U.S. Bankruptcy Court for the Eastern District of Michigan," *26 Mich. Real Property Review* 19 (1999).

- "The 'New Value' Exception: Myth or Reality After *Bank of America National Trust & Savings Association v. 203 N. LaSalle Street Partnership*," *104 Comm.L.J.* 147 (1999).
- "Recent Developments in New Value and Single Asset Real Estate Cases," *24 Michigan Real Property Review* 23 (1998).
- "Valuation After *Commercial Associates Corp. v. Rash*; Landlord Beware! What Happens to the Option to Renew When the Tenant Files Bankruptcy," *24 Mich. Real Property Review* 135 (1997).

Speaking Engagements

- Moderator, "Drafting and Enforcing Contracts in Light of COVID-19," State Bar of Michigan Debtor/Creditors Rights Committee (2021).
- Moderator, "Michigan's 'New Expanded' Receivership Act," State Bar of Michigan Debtor/Creditors Rights Committee (2020).
- Presenter, "Understanding the Nuts & Bolts of the 'New' Subchapter V Small Business Chapter 11," American Bankruptcy Institute Webinar (May 7, 2020).
- "ESI (Electronically Stored Information) Under the New Michigan Court Rules," Discovery Rules Evening Forum, Michigan Association for Justice, (September 26, 2019).
- Presenter, "New Commercial Real Estate Receivership Act," Michigan Judicial Institute, Business Law Judges (June 25, 2018).
- Moderator, "The 'New' (Not So New) Uniform Assignment of Rents Statute – A Sign of Better Things to Come?," American Bar Association, Business Bankruptcy Committee (April 13, 2018).
- Presenter, "Assignment of Rents and Bankruptcy," State Bar of Michigan, Debtor/Creditor Rights Committee (August 9, 2017).
- Presenter, "Electronic Discovery (ESI) Issues For Business Lawyers," ABA Business Law Section, Spring Meeting (April 2016).
- Moderator, "The New Playing Field for State Court Receivership: The View from the Bench," State Bar of Michigan Business Law Section (Spring 2015).
- Keynote Luncheon Speaker, "Ethics – Honor the Profession," American Bankruptcy Institute, 2015 Chicago Consumer Bankruptcy Conference (October 12, 2015).
- Presenter, "Electronically Stored Information (ESI) and Discovery Issues in Bankruptcy," Federal Bar Association, Western District of Michigan, 27th Annual Bankruptcy Seminar (July 31, 2015).
- Moderator, "All You Ever Wanted to Know (And Were Afraid to Ask But Now Can!) About the Detroit Bankruptcy," Joint Program of the Debtor-Creditor Rights Committee of the Business Law Section of the State Bar of Michigan and the Bankruptcy Section of the Federal Bar Association of the Eastern District of Michigan (July 2015).
- Presenter, "Electronically Stored Information (ESI) Discovery for Bankruptcy Practitioners," Debtor-Creditor Rights Committee of the Business Law Section of the State Bar of Michigan (May 15, 2015).
- Presenter, Campbell Law School Symposium on Municipal Restructurings (October 17, 2014).
- Presenter, "Take the Fight Outside! Dispute Resolution in Commercial Finance – Protecting the Value of the Deal, Use and Enforcement of Arbitration Provisions in Workouts and Bankruptcy Cases," American Bar Association, Business Law Section Fall Meeting (September 12, 2014).
- Moderator, "MCR 2.621 and MCR 2.622 – The New Playing Field for State Court Receiverships," (June 10, 2014).

- Presenter, "Electronic Discovery (ESI) Issues in Bankruptcy Cases (When Electronic Discovery and Bankruptcy Collide)" The Bankruptcy & Insolvency Litigation Committee, the Business Bankruptcy Committee, and the Bankruptcy Court Structure and Insolvency Process Committee Roundtable (March 6, 2014).
- Presenter, "The ABI National Ethics Task Force Report," Cleveland Bar Association, 2013 O'Neill Institute (June 7, 2013).
- Presenter, "Presentation of the Final Report of the Ethics Task Force," American Bankruptcy Institute, 31st Annual Spring Meeting (April 21, 2013).
- Presenter, "Complex Bankruptcy Litigation in a Stern World," American Bankruptcy Institute, 24th Annual Winter Leadership Conference (November 30, 2012).
- Presenter, "I Consent [To the Bankruptcy Court Hearing] – Not So Fast!!!," American Bar Association, Business Bankruptcy Committee, Business Law Section (November 27, 2012).
- Presenter, "It's Never Over: Post-Confirmation Jurisdiction, Liquidating Trusts and the Continuing Pursuit of Assets," Commercial Law League of America, Current Developments in Hot & Emerging Areas of Bankruptcy, National Conference of Bankruptcy Judges (October 25, 2012).
- Presenter, "What Non-Bankruptcy Attorneys Need to Know About Bankruptcy," State Bar of Michigan, Solo and Small Practitioner's Section (October 2012).
- Presenter, "What Have You Done to Me Lately? *Stern v. Marshall* and Bankruptcy Court Jurisdiction," American Bankruptcy Institute, 18th Annual Central States Bankruptcy Workshop (June 8, 2012).
- Presenter, "Managing Ethical Dilemmas in Restructuring and Turnaround Ethic and Professional Responsibility," Joint TMA/IWIRC Presentation on Ethics (May 16, 2012).
- Presenter, "21st Century Ethics – Part I," American Bankruptcy Institute, Annual Spring Meeting (April 2012).
- Presenter, "Ethics – National Standards for Professional Conduct by Lawyers in Bankruptcy Cases," State Bar of Wisconsin, Bankruptcy, Insolvency & Creditors Rights Section (March 1—2, 2012).
- Presenter, "Ethical Standards Reexamined – A Discussion of New National Ethics Standards for Practitioners," 2012 National CLE Conference (January 6, 2012).
- Presenter, "Getting What You Bargained For: Hot Issues Impacting the Chapter 11 Confirmation Process, 2012 National CLE Conference (January 6, 2012).
- Presenter, "*Stern v. Marshall* and Bankruptcy Court Jurisdiction," Commercial Law League of America and its Bankruptcy Section, National Webinar (October 4, 2011).
- Presenter, "Actions to Avoid and Recover Fees," American Bankruptcy Institute, Annual Spring Meeting (April 2011).
- Presenter, "Title II, The Orderly Liquidation Authority Under the Dodd-Frank Wall Street Reform and Consumer Protection Act," The University of Miami Law School, The Business and International Comparative Law Symposium (April 2, 2011).
- Moderator, "Lehman Failure Replayed: Would FDIC Liquidation Be More Orderly Than Bankruptcy?," American Bar Association, Spring Business Law Meeting, Joint Presentation of the Business Bankruptcy Committee and the Banking Committee (April 2011).
- Presenter, "Navigating Through the Ethical Maze of Fiduciary Duties: Ratting on Clients and Other Hazards," American Bankruptcy Institute, Valcon Conference (February 25, 2011).
- Presenter, "Current Issues in Chapter 11, The Estate Versus the Debtor in Possession – To Whom Do You Owe Fiduciary Duties and the Implications of Breaching that Duty and Recent Case Law Update," National CLE Conference (January 6, 2011).

- Presenter, "*Iqbal & Twombly*: Application of the New Heightened Pleading Standard in Bankruptcy Cases," National CLE Conference (January 6, 2011).
- Presenter, "Bankruptcy Basics – What You Need to Know," Michigan Association of CPA's Construction Industry Conference (August 2010).
- Presenter, "The New Financial Reform Act: What Does It Mean For Your Practice?," American Bar Association, National Webinar on Dodd-Frank Wall Street Reform and Consumer Protection Act (August 2010).
- Presenter, "Ethics & Professional Responsibility – the Basics, Professional Standards for Retention, Disclosure, Disinterestedness, Duty of Confidentiality, Inadvertent Disclosure, Conflicts of Interest, Mobility of Counsel and E-Discovery Issues," American Bankruptcy Institute, 28th Annual Spring Meeting, Nuts & Bolts Program (April 29, 2010).
- Presenter, "Dealing With the 800lb Gorillas – The Practical Guide to Chapter 11 Administration, Priority and Reclamation Claims," National CLE Conference (January 6, 2010).
- Presenter, "Litigation: Ethics – Professional Conflicts and Disclosures," Southeastern Bankruptcy Institute (April 23, 2009).
- Presenter, "Retail Issues – Reclamation and Section 503(b)(9) Claims," Southeastern Bankruptcy Institute (April 23, 2009).
- Presenter, "Navigating the Complex Web of Ethical Issues in Business Bankruptcies: Conflicts of Interest, Disclosure, Disinterestedness and Other Issues," Federal Bar Association, Western District of Michigan, Annual Bankruptcy Seminar (July 26, 2008).
- Presenter, "Ethics and Change – The New Ohio Code of Professional Responsibility," Cleveland Bar Association, 2008 O'Neill Great Lakes Regional Bankruptcy Institute (May 29, 2008).
- Presenter, "What Commercial Litigators Need to Know About Bankruptcy," State Bar of Michigan, Business Law Section, Commercial Litigation Committee (April 30, 2008).
- Presenter, "Navigating the Complex Web of Ethical Issues in Business Bankruptcies: Conflicts of Interest, Disclosure, Disinterestedness, Disgorgement and Other Issues," Alleghany Bankruptcy Association, 20th Annual Bankruptcy Symposium (November 30, 2007).
- Presenter, "Ouch – Administrative Insolvency and Disgorgement of Fees – Case Strategies," American Bankruptcy Institute, Central States Bankruptcy Workshop (June 14, 2007).
- Presenter, "The Application of State Ethics Rules in Bankruptcy: Are We Just Holding Our Noses and Looking the Other Way?," American Bankruptcy Institute, 25th Annual Spring Meeting (April 12, 2007).
- Presenter, "Recent Developments Affecting Business and Chapter 11 Cases Under the Bankruptcy Abuse Prevention and Consumer Protection Act," American Bankruptcy Institute, Annual Winter Leadership Conference (December 1, 2006).
- Presenter, "Everything You Always Wanted to Know (And Didn't Necessarily Ask) About Creditor Committee Representation, Negotiating the Ethical Minefield of Creditors Committee Representation – Luring, Landing and Keeping the 'Big Fish'," Commercial Law League of America, 21st Annual Current Developments in Hot & Emerging Areas, National Conference of Bankruptcy Judges (November 2, 2006).
- Presenter, "Bankruptcy Ethics," Detroit Bankruptcy Bar, BAPCPA: One Year Later, A Columbus Day Seminar (October 9, 2006).
- Presenter, "Recent Developments Affecting Businesses and Chapter 11 Cases Under the Bankruptcy Abuse and Consumer Protection Act," American Bar Association, Annual Meeting, Presentation of the Business Bankruptcy Committee (August 5, 2006).

- Presenter, "Analysis of New Bankruptcy Law, Amendments Under the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005, Chapter 11 and Business Bankruptcy Amendments," Commercial Law League of America, Midwest Regional Meeting (April 8, 2005).
- Presenter, "Proposed Revisions to Bankruptcy Code From S.256 as Relates to Avoidance Actions", American Bar Association, Spring Meeting of the Business Law Section (March 31, 2005).
- Moderator, "Getting to a Verdict – Evidence to Successfully Prove an Avoidance Action Through the Use of Expert and Consulting Witnesses," American Bar Association, Spring Meeting of the Business Law Section (March 31, 2005).
- Presenter, "Tenancy by the Entireties," American Bankruptcy Institute, 16th Annual Winter Leadership Conference (December 2, 2004).
- Presenter, "The Plan of Reorganization – A Thing of the Past? Pushing the Envelope in Liquidation of the Estate," American Bankruptcy Institute, Central States Bankruptcy Workshop (June 3, 2004).
- Presenter, "Acquisition of the Troubled Company," American Bar Association, Business Law Section, 8th Annual National Institute on Negotiating Business Acquisitions (November 6, 2003).
- Moderator, "The Power of the Bankruptcy Court to Issue Sanctions and Penalties – The Origin of the Power – The Necessity Doctrine and Section 105 of the Bankruptcy Code," American Bar Association, Business Bankruptcy Committee (October 17, 2003).
- Presenter, "Forum Shopping, First Day Order and Case Management Issues in Bankruptcy and Fiduciary Duties: Indemnification, Pre-Petition and Pursuing Actions Before Filing," DePaul Business and Commercial Law Journal Symposium on Mega-Bankruptcies: Representing Creditors and Debtors in Large Bankruptcies (April 10, 2003).

Awards

- Top Rated Lawyer in Commercial Litigation, American Lawyer Media and Martindale-Hubbell (2013)
- Honoree, *Best Lawyers in America* (2020-2023)
- Honoree, *Michigan Super Lawyers* (2006-2023)
- *Best Lawyers in America*, Bankruptcy and Creditors Rights (2022-2023)
- Top Women Attorneys in Michigan, *HOUR Detroit Magazine* (2015)
- Nationally Recognized Bankruptcy Leader, Michigan Consumer Bankruptcy Association (2000)

Professional Affiliations

- American Bankruptcy Institute, Chair, National Ethics Standards Task Force, 2010-2013, Co-Chair, Ethics and Professional Compensation Committee, 2008-2011, Member, Central States Bankruptcy Workshop Advisory Board, 1998-2003
- American Bankruptcy Law Journal, Member, Advisory Editorial Board, 2013-2016
- American Bar Association, Member, Business Law Section, Co-Chair of Professional Ethics Committee of the Business Bankruptcy Committee, 2023-Current, Business Bankruptcy Committee, 2001-Current, Co-Chair, Executory Contracts Committee, 2000-Current, Legislation Sub-Committee, 2017-2000, Chair, Membership Subcommittee, 2012-2015, Director, Membership Committee of the Business Law Section, 2012-2015, Co-Chair, Bankruptcy Appeals Subcommittee, 2005-2008, Chair, Litigation Subcommittee, 2002-2005, Committee on Bankruptcy Court Structure and the Insolvency Process, Chair, Attorney Discipline Task Force, Co-Chair, Task Force on Bankruptcy Rules, Member, Electronic Discovery Task Force, Katrina Hurricane Task Force, and Task Force on Bankruptcy Rule 2019
- Commercial Law League of America, Member, Bankruptcy and NCBJ Committee Sections, 2007-

Taft /

Present, Chair, Bankruptcy Section, 2002, Chair, NCBJ Committee, 2007-2012

- Detroit Metropolitan Bar Association, Chair, Bankruptcy Committee, 1997-2002
- Federal Bar Association for the Eastern District of Michigan, Bankruptcy Committee
- U.S. Bankruptcy Court for the Eastern District of Michigan, Bankruptcy Court Advisory Committee, Mediation Panel, Chapter 11 Rules Committee, Bankruptcy Judges Tribute Dinner Committees
- State Bar of Michigan, Civil Discovery Court Review Special Committee, Co-Chair, Business Law Section, Debtor-Creditor Rights Committee, 2000-Current, Co-Chair, Amicus Briefing Committee, 2022, Receivership Task Force and the Assignment of Rents Task Force, 2010-2013, Business Council, 2010-2013, American Jewish Committee, Member, Executive Committee, Chair, Nominating Committee, 1998-2014

Community Involvement

- Care House Oakland County, Development Committee, Board of Directors
- Detroit Chapter of the American Jewish Committee, Board of Trustees, 1998-2008, 2015-2017, Vice President, 2005-2007, Secretary, 2003-2004, Treasurer, 2000-2003, Chair, Nominating Committee, 1998-2012, Member, Executive Committee, 2000-2008
- Eisenhower Dance Company, Board of Directors, 2003-2010
- Gleaners Food Bank of Southeastern Michigan, Member, Vice-Chair, Development Committee
- Great Lakes Chamber Music Festival, Board of Directors, Nominating, Development and Community, Engagement/DEI Committees
- The Heidelberg Project, Board of Directors, 2010-2012

Julie Norton

EDISCOVERY PROJECT MANAGER / DETROIT
(SOUTHFIELD)

E: jnorton@taftlaw.com
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F: (248) 351-3082

Julie supports the firm's attorneys in managing all phases of eDiscovery for their clients including identification and collection of ESI, search strategies, document review and coding, and document production. She also has extensive experience with and a comprehensive understanding of the technical and legal aspects of eDiscovery.

Julie earned her bachelor's degree in criminal justice and history from Western Michigan University and a paralegal certificate from the University of California Los Angeles.

Professional Affiliations

- Oakland County Bar Association
Member, Paralegal Section



Practices

eDiscovery
Commercial Litigation

Education

University of California Los Angeles
Western Michigan University

Lauren Sell

PARALEGAL / DETROIT (SOUTHFIELD)

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Lauren is a paralegal in Taft's Southfield office. She provides support to the firm's Real Estate group as well as the Bankruptcy and Restructuring group.

Prior to joining the firm, Lauren was a paralegal with a well-known international law firm based in Miami. Lauren brings over ten years of experience working in the legal field.

Lauren earned her bachelor's degree in criminology from the University of Tampa.



Practices

Real Estate

Bankruptcy and Restructuring

Education

University of Tampa (2014)

Jay Welford

PARTNER / DETROIT (SOUTHFIELD)

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Jay is an attorney in our Bankruptcy and Restructuring and Mergers and Acquisitions practice groups. He specializes in the areas of bankruptcy and corporate restructuring, lending and leasing law, and general corporate representation.

In the bankruptcy and corporate restructuring areas, Jay represents debtors, creditors' committees, lenders, and leasing companies. He acts as origination and recovery counsel for various lending institutions and leasing companies. Based on his corporate restructuring experience, Jay also acts as outside general counsel to a variety of companies in diverse industries, including construction, manufacturing, trucking, business services, and equipment leasing. Through his years of engagements, Jay also has specific expertise in franchising law, including the development of franchise systems. Jay has assisted a variety of clients in the formation of joint ventures, including joint ventures seeking minority certification.

Jay is a frequent author and lecturer for such organizations as the Commercial Law League of America, the American Bankruptcy Institute, Law Education Institute, the Equipment Leasing, and Finance Association, and the National Business Institute.

Testimony

- National Bankruptcy Review Commission, Washington, D.C., Feb. 20, 1997.
- National Bankruptcy Review Commission, Washington, D.C., May 14, 1997.
- Administrative Office of the U.S. Courts, Advisory Committee on Bankruptcy Rules, Washington, D.C. Jan. 28, 1999.
- House and Senate Conference Committee on HR 3150, Washington, D.C., Sept. 29, 1998.

Practices

Bankruptcy and Restructuring
Mergers and Acquisitions

Education

Wayne State University Law School
University of Michigan

Admissions

State - Michigan

- Deputy Economic Advisor to the President Regarding HR 3150, Sept. 29, 1998.

Speeches and Publications

Publications

- Author: "Forbearance Agreement Drafting Tips," *Lease Enforcement Attorney Network* (April 2018).
- Author: "The Commercial Real Estate Receivership Act," *Commercial Law World* (April 2018).
- Co-Author: "Representing the Creditors' Committee—A Guide for Practitioners," *ABI Unsecured Trade Creditors Committee* (April 2016).
- Author: "Think Long and Hard Before You Sign Your Client's Proof of Claim Form," *American Bankruptcy Institute Unsecured Trade Creditors Newsletter* (March 2014).
- Author: "Think Long and Hard Before You Sign Your Client's Proof of Claim Form," *Commercial Law League of America Newsletter* (January 2014).
- Author: "Consent Judgment or Default Judgment, It Makes a Difference," *Commercial Law League of America Newsletter* (January 2013).
- Co-Author: "503(b)(9) Claimants—The New Constituent, a/k/a 'The 500 Pound Gorilla' at the Table," *The Michigan Business Law Journal* (Spring 2008).
- Author: "Saving Graces—Ten Steps to Preserve and Improve Forbearance Programs," *Equipment Leasing Today* (March 2008).
- Co-Author: "503(b)(9) Claimants—The New Constituent at the Table," *Business Credit*, a publication of the National Association of Credit Management (May 2007).
- Co-Author: "503(b)(9) Claimants—The New Constituent, a/k/a 'The 500 Pound Gorilla' at the Table," *De Paul Business & Commercial Law Journal* (Spring 2007).
- Author: "A Lessor's Walk Down the Bankruptcy Aisle , " *Equipment Leasing Today* (February 2007).
- Co-Author: "WARN Poses Hurdle for Distressed Firms," *The Bankruptcy*

Strategist, Volume VIII, November, 11 (October 1989).

- Author: "Unpaid Administrative Claimant's Ability to Obtain a Surcharge," *The Bankruptcy Strategist, Volume V, Number 1* (November 1987).
- Author: "Undersecured Creditor Denied Interest, Lost Opportunity Costs," *The Bankruptcy Strategist, Volume IV, Number 7* (May 1987).
- Author: "An Overview of the Bankruptcy Judges, United States Trustees and Family Farmer Bankruptcy Act of 1986," *13 Michigan Real Property Review No. 4* (Winter 1986).
- Co-Author: "Lost Opportunity Costs Denied by Fifth Circuit," *The Bankruptcy Strategist, Volume III, Number 12* (October 1986).
- Co-Author: "Creditors' Committee: Right to Initiate Suits," *The Bankruptcy Strategist, Volume III, Number 10* (August 1986).
- Co-Author: "Charting the Way to Perfecting Post-Petition Construction Liens," *The Bankruptcy Strategist, Volume III, Number 4* (February 1986).
- Co-Author: "Treatment of Land Contracts in Bankruptcy – Executory Contracts or Liens," *11 Michigan Real Property Law Review No. 4* (Winter 1984).
- Co-Author: "The Bankruptcy Amendments and Federal Judgeship Act of 1984," *63 Michigan Bar Journal* 775 (1984).
- Co-Author: "The Effect of the Bankruptcy Amendments and Federal Judgeship Act of 1984 on the Real Estate Practitioner," *11 Michigan Real Property Law Review No. 3* (Fall 1984).

Speaking Engagements

- "Bankruptcy Basics for Non-Bankruptcy Practitioners," Commercial Law League of America National Convention (May 19, 2022).
- "Basic Bankruptcy From F to C (Filing to Confirmation); A practical Chapter 11 Overview for the Non-Bankruptcy Practitioner." Commercial Law League of America Annual Conference (2019).
- "The New Uniform Commercial Real Estate Receivership Act," Commercial Law League of America (May 2018).
- "Basic Bankruptcy from F to C (Filing to Confirmation), A Practical

Chapter 11 Overview for the Non-Bankruptcy Practitioner," Commercial Law League of America (November 2016).

- "Hidden Assets in Consumer and Business Bankruptcy Cases," Commercial Law League of America (April 2016).
- "Hidden Liens and Priorities," Commercial Law League of America (April 2015).
- "Current Issues in Creditors' Committee Representation," Commercial Law League of America (April 2014).
- "Traps for the Unwary in the Courtroom," Commercial Law League of America (November 2012).
- "Current Issues for Lessors and Lenders," Lease Enforcement Attorney Network Webinar (January 2012).
- "The Practical Guide to Chapter 11 Administrative, Priority and Reclamation Claims," 27th Annual CLE Conference on Bankruptcy Law (January 2010).
- "Hidden Liens and Other Traps for the Unwary," 26th Annual CLE Conference on Bankruptcy Law (January 2009).
- "Structuring Asset Sales In and Out of Bankruptcy," Commercial Law League of America (November 2008).
- "Hidden Liens," Equipment Leasing Association Legal Forum (April 2008).
- "The Anatomy of a Forbearance Agreement," Equipment Leasing Association Legal Forum (April 2008).
- "Trade Creditor New Status (or Not) Section 503(b)(9), Reclamation and Related Issues," 25th Annual National CLE Conference on Bankruptcy Law (January 2008).
- "Navigating the Chapter 11," Equipment Leasing Association Legal Forum (May 7, 2007).
- "BAPCPA: One Year Later, Small Business Bankruptcy Provisions," Debtor/Creditor Rights Committee, Business Law Section, State Bar of Michigan (Oct. 9, 2006).
- "Bankruptcy Update: Bankruptcy Abuse Prevention and Consumer Protection Act," Equipment Leasing Association-Legal Forum (May 1,

2006).

- “Negotiate or Litigate-A Roundtable Discussion,” Equipment Leasing Association Legal Forum (May 2006).
- “Business Bankruptcy: Aligning Your Practice With the New Bankruptcy Code Amendments,” National Constitution Center (March 7, 2006).
- “Early Implementation Issues Arising Under the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005,” American Bankruptcy Institute Winter Leadership Conference (Dec. 2, 2005).
- “Small Business Bankruptcy Provisions of the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005,” Debtor/Creditor Rights Committee of the Business Law Section of the State Bar of Michigan (Aug. 24, 2005).
- “New Bankruptcy Code Seminar, Business Bankruptcy Provisions,” Cobo Center, Detroit, Michigan (June 3, 2005).
- “Business Bankruptcy Practice Under the New Code,” Telephonic Seminars Sponsored by the Commercial Law League of America (May 25, 2005 and June 22, 2005).
- “Bankruptcy Reform: Understanding the 2005 Amendments to the Bankruptcy Code, Small Business, Bankruptcy Data, Bankruptcy Tax and Health Care Provisions,” Cleveland Bar Association, Cleveland, Ohio (May 20, 2005).
- “Bankruptcy Abuse Prevention and Consumer Protection Act of 2005,” Midwest Regional Meeting of the Commercial Law League of America (April 8, 2005).
- “The Role of the Accountant in Assisting the Troubled Business In and Out of Bankruptcy,” Michigan Association of Certified Public Accountants (April 29, 2003).
- “New UCC Article 9— It’s Here and You Cannot Avoid It Any Longer,” American Bankruptcy Institute Central States Bankruptcy Conference (June 8, 2001).
- “Hidden Liens and Priorities,” 2001 National CLE Conference, Bankruptcy Law (Jan. 10, 2001).
- “Hidden Liens and Priorities,” Midwestern/Southern Meeting of the

Commercial Law League of America (March 4, 2000).

- "Enforcement of Pre-petition Liens in Bankruptcy," 1999 National CLE Conference, Bankruptcy Law (Jan. 12, 1999).
- "Overview of the National Bankruptcy Review Commission's Official Report," 77th Regional Meeting of the Commercial Law League of America (Nov. 21, 1997).
- "What the Bankruptcy Review Commission Should Consider," 75th Regional Meeting of the Commercial Law League of America (Nov. 17, 1995).
- "Guarantor Liability – Issues Arising Under the Bankruptcy Code," First Annual Bankruptcy Law Update, Law Education Institute and The Bureau of National Affairs (Jan. 11, 1994).
- "The Use of Experts in Chapter 11 Proceedings," Midwest Regional Conference of the Commercial Law League of America (March 26, 1993).
- "Negotiating Cash Collateral and Interim Financing Orders – The Unsecured Creditors vs. The Secured Lender," Midwest Regional Conference of the Commercial Law League of America (April 11, 1992).
- "Guarantor Liability – Issues Arising Under the Bankruptcy Code and Regulations B and Z," 69th Eastern Regional Meeting of the Commercial Law League of America (Nov. 17, 1989).
- "How to Collect the Uncollectable – Recovery of Fraudulent Conveyances Under the Bankruptcy Code and Under the Uniform Laws," Midwestern Regional Conference of the Commercial Law League of America (March 22, 1988).
- "Bankruptcy Litigation & Practice in Michigan," Professional Education Systems, Inc., (April 29, 1987).
- "Corporate Reorganizations Under Chapter 11 of the Bankruptcy Code: The Role of the Accountant for the Chapter 11 Debtor," Oakland University, Division of Continuing Education, CPA Weekend (June 8, 1985 and June 6, 1987).
- "Creditor Rights and Protection of Security Interests in Bankruptcy," National Business Institute (Aug. 2, 1985).

Awards

- Recipient of the President's Cup (outstanding service, professional conduct, and demonstrating the highest levels of ethical, moral and civic responsibility), Commercial Law League of America (2013)
- Honoree, *Best Lawyers in America* (2002 – present)
- Honoree, *Michigan Super Lawyers*, Creditor Debtor Rights (2006 – present)
- AV Peer Review Rated (Preeminent), LexisNexis/Martindale-Hubbell
- Honoree, *Chambers USA: America's Leading Lawyers in Business* (2007)
- Honoree, Midwest Top Rated Lawyers (2013 – present)
- Honoree, *Leading Lawyers*, *American Lawyer Media* (2016 – present)
- Honoree, *DBusiness* Top Lawyers (2011 – 2014)
- Honoree, Top Lawyer, *Business Magazine* (2009 – present)

EXHIBIT 6

(Summary of Fee Application of Taft Stettinius & Hollister, LLP for Payment of Compensation and Reimbursement of Expenses as Counsel to Thomas Bruinsma, Chapter 7 Trustee of Barfly Ventures, LLC, et al.)

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

BARFLY VENTURES, LLC, *et al.*¹
Debtors.

Chapter 7
Hon. James W. Boyd
Consolidated
Case No. 20-01947

**SUMMARY OF FEE APPLICATION OF TAFT STETTINIUS & HOLLISTER, LLP
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES AS
COUNSEL TO THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF BARFLY
VENTURES, LLC, et al. FOR THE PERIOD FROM MAY 19, 2021 TO AUGUST 31, 2023**

Name of Applicant:	Taft Stettinius & Hollister, LLP
Authorized to Provide Professional Services to:	The above captioned Chapter 7 Trustee
Period for which compensation and reimbursement are sought:	May 19, 2021 to August 31, 2023
Amount of Compensation sought as actual, reasonable, and necessary:	\$601,718.00
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$40,255.13
Petition Date:	June 3, 2020

¹ The substantively consolidated debtors are: Barfly Ventures, LLC (8379), Barfly Management, LLC (6274), 9 Volt, LLC (d/b/a HopCat) (1129), 50 Amp Fuse, LLC (d/b/a Stella's Lounge) (3684), GRBC Holdings, LLC (d/b/a Grand Rapids Brewing Company) (2130), E L Brewpub, LLC (d/b/a HopCat East Lansing) (5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago, LLC (7552), HopCatConcessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat-GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat-Indianapolis, LLC (d/b/a HopCat-Broad Ripple) (7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a HopCat,-KC, LLC and Tikicat) (6242), HopCat-Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), HopCat-Royal Oak, LLC (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House, LLC and McFadden's Restaurant Saloon) (4255).

Date of Conversion:	May 18, 2021
Date of Appointment of Chapter 7 Trustee:	May 18, 2021
Date of Order Approving Retention:	July 12, 2021
Number of Professionals Included in this Application:	9
Number of Professionals Billing Fewer Than 15 Hours:	3
Prior Interim Applications Filed: 0	Prior Monthly Fee Statements Filed: 0

EXHIBIT 7
(Summary of Statements by Category)

YEARLY SUMMARY OF STATEMENTS BY CATEGORY

ASSET AND ANALYSIS

Year	Hours	Fees
2021	302.90	\$123,344.00
2022	728.80	\$310,488.50
2023	264.00	\$111,878.50
TOTAL	1,295.90	\$545,711.00

CASE ADMINISTRATION

Year	Hours	Fees
2021	17.60	\$7,361.50
2022	0.40	\$170.00
2023	3.20	\$1,571.00
TOTAL	21.20	\$9,102.50

CLAIMS ADMINISTRATION

Year	Hours	Fees
2021	0.30	\$127.50
2022	0.00	\$0.00
2023	52.90	\$25,430.50
TOTAL	53.90	\$25,557.50

EMPLOYMENT

Year	Hours	Fees
2021	11.90	\$4,667.50
2022	0.00	\$0.00
2023	6.10	\$2,451.50
TOTAL	18.00	\$7,119.00

PPE LOAN FORGIVENESS

Year	Hours	Fees
2021	1.5	\$637.50
2022	0.0	\$0.00

2023	0.00	\$0.00
TOTAL	2.4	\$637.50

FEE APPLICATION

Year	Hours	Fees
2021	0.00	\$0.00
2022	0.00	\$0.00
2023	28.90	\$13,590.50
TOTAL	28.90	\$13,590.50

EXHIBIT 8
(Monthly Statements of Expenses)

May 2021

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	OrigQty	OrigAmt	RevQty	RevAmt	Vendor	Voucher	Check No.
05/28/2021	DISB		051	Copying/printing		2358	76.00	11.40	76.00	11.40	0	0
				Copy expense #2							0	0
05/28/2021	DISB		062	Federal Express		2582	0.00	31.48	0.00	31.48	0	0
				Tracking number: 1z2vy8841396147411							0	0
05/28/2021	DISB		062	Federal Express		2582	0.00	43.58	0.00	43.58	0	0
				Tracking number: 1z2vy8841396968981							0	0
05/28/2021	DISB		062	Federal Express		2582	0.00	43.58	0.00	43.58	0	0
				Tracking number: 1z2vy8841397400199							0	0
05/28/2021	DISB		053	Outside Fax Charges/Shefsky		2869	30.00	4.50	30.00	4.50	0	0
				Fax charges							0	0
05/29/2021	DISB		062	Federal Express		2582	0.00	18.00	0.00	18.00	0	0
				Tracking number: 1z2vy8841397400199							0	0
Report Totals:							106.00	196.12	106.00	196.12		

June 2021

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM Task	Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Qty	Rev Amt	Vendor	Voucher	Check No.
06/01/2021	DISB		062	Federal Express		2582	0.00	18.00	0.00	18.00		0 0
				Tracking number: 1z2vy8841396147411								
06/09/2021	DISB		039	Westlaw search - in contract		9467	0.00	31.02	0.00	31.02		0 0
				Westlaw charges								
06/23/2021	DISB		027	Professional services		2698	22.00	101.60	22.00	101.60		0 0
				Pacer charges net charges								
Report Totals:						22.00	150.62	22.00	150.62			

July 2021

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Orig.Qty	Orig.Amt	Rev.Qty	Rev.Amt	Vendor	Voucher	Check No.
07/06/2021	DISB	062		Federal Express		2422	0.00	20.02	0.00	20.02		0
	Federal express airbill: 774182299884											
07/09/2021	DISB	051		Copying/printing		2394	38.00	5.70	38.00	5.70		0
	Copy expense # 2											
07/21/2021	DISB	039		Westlaw search - in contract		2698	2.00	242.56	2.00	242.56		0
	Westlaw charges											
07/30/2021	DISB	009		Misc.		2698	0.00	20.20	0.00	20.20		0
	Telephone charges cc											
	Report Totals:						10.00	288.48	40.00	288.48		

August 2021

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Amt	Vendor	Voucher	Check No.
08/02/2021	DISB Postage expense	006		Postage		2869	2.00	1.62	2.00		0
08/03/2021	DISB Copy expense #2	051		Copying/printing		2796	2.00	0.30	2.00		0
08/09/2021	DISB Copy expense #2	051		Copying/printing		2134	6.00	0.90	6.00		0
08/12/2021	DISB Pacer charges net charges	027		Professional services		2698	29.00	70.00	29.00		0
08/24/2021	DISB Westlaw charges	039		Westlaw search - in contract		2815	9.00	702.80	9.00		0
08/27/2021	DISB Telephone charges cc	009		Misc.		2698	0.00	28.31	0.00		0
								46.00	803.93	48.00	803.93

October 2021

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

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Date	Matter	SM/Task	Service Code	Description	Attorney	Org Amt	Rev Amt	Vendor	Voucher	Check No.
10/26/2021	DISB	027		Professional services	2139	0.00	20.00	0.00	20.00	0
	File transfer									
10/26/2021	DISB	062		Federal Express	2582	0.00	41.17	0.00	41.17	0
	Tracking number: 1z2vy8840190725365									
10/27/2021	DISB	087		Relativity External User Fee for e-Discv	2767	1.30	19.50	1.30	19.50	0
	E-discovery - storage									
10/27/2021	DISB	110		Relativity Data Hosting Fee	2767	9.82	1,227.50	9.82	1,227.50	0
	E-discovery - services									
10/31/2021	DISB	087		Relativity External User Fee for e-Discv	2767	94.14	1,412.10	94.14	1,412.10	0
	E-discovery - storage									
10/31/2021	DISB	110		Relativity Data Hosting Fee	2767	13.87	1,733.75	13.87	1,733.75	0
	E-discovery - services									
Report Totals:					11913	4,454.02	11913	4,454.02		

August 2021

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Org. qty	Org. Amt.	Rev. Amt.	Vendor	Check No.	Voucher
08/02/2021	DISB Postage expense	006		Postage		2869	2.00	1.62	2.00	1.62	0
08/03/2021	DISB Copy expense # 2	051		Copying/printing		2796	2.00	0.30	2.00	0.30	0
08/09/2021	DISB Copy expense # 2	051		Copying/printing		2134	6.00	0.90	6.00	0.90	0
08/12/2021	DISB Pacer charges net charges	027		Professional services		2698	29.00	70.00	29.00	70.00	0
08/24/2021	DISB Westlaw charges	039		Westlaw search - in contract		2815	9.00	702.80	9.00	702.80	0
08/27/2021	DISB Telephone charges cc	009		Misc.		2698	0.00	28.31	0.00	28.31	0
Report Totals										48.00	803.93
										48.00	803.93
										48.00	803.93

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SMTask	Service Code	Description	Attorney	Orig.Qty	Orig.Amt	Rev.Ctry	Voucher	Check No.
10/26/2021	DISB File transfer	027		Professional services	2139	0.00	20.00	0.00	20.00	0
10/26/2021	DISB Tracking number: 122vy8840190725365	062		Federal Express	2582	0.00	44.17	0.00	44.17	0
10/27/2021	DISB E-discovery - storage	087		Relativity External User Fee for e-Discv	2767	1.30	19.50	1.30	19.50	0
10/27/2021	DISB E-discovery - services	110		Relativity Data Hosting Fee	2767	9.82	1,227.50	9.82	1,227.50	0
10/31/2021	DISB E-discovery - storage	087		Relativity External User Fee for e-Discv	2767	94.14	1,412.10	94.14	1,412.10	0
10/31/2021	DISB E-discovery - services	110		Relativity Data Hosting Fee	2767	13.87	1,733.75	13.87	1,733.75	0
Report Totals										119.13
										4,453.02
										119.13
										4,453.02

October 2021

December 2021

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM Task	Service Code	Description	Attorney	Orig Qty	Dig Ant	Rev Qty	Rev Amt	Vendor	Voucher	Check No.
12/17/2021	DISB Copy expense # 2	051		Copying/printing		2869	27.00	4.05	27.00	4.05		0
12/20/2021	DISB Postage expense	006		Postage		2582	0.00	405.11	0.00	405.11		0
12/20/2021	DISB Copy expense # 2	051		Copying/printing		2869	29.00	4.35	29.00	4.35		0
12/28/2021	DISB E-discovery - storage	087		Relativity External User Fee for e- DISCV		2767	92.42	1,386.30	92.42	1,386.30		0
12/28/2021	DISB E-discovery - services	110		Relativity Data Hosting Fee		2767	7.42	927.50	7.42	927.50		0
12/30/2021	DISB Telephone charges cc	009		Misc.		2698	0.00	1.00	0.00	1.00		0
12/30/2021	DISB Telephone charges cc	009		Misc.		2698	0.00	1.00	0.00	1.00		0
Report Totals:												
									155.84	2,729.31	155.84	2,729.31

January 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

February 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Ong.Org.	Ong.Amt.	Rev.Org.	Rev.Amt.	Vendor	Voucher	Check No.
02/09/2022	DISB	062	Federal Express		2582	0.00	87.92	0.00	87.92			0
	Tracking number: 1z17a5051522478144											
02/10/2022	DISB	051	Copying/printing		2394	300.00	45.00	300.00	45.00			0
	Copy expense # 2											
02/16/2022	DISB	051	Copying/printing		2996	383.00	57.45	383.00	57.45			0
	Copy expense # 2											
02/25/2022	DISB	087	Relativity External User Fee for e-Discovery - storage		2767	93.87	1,408.05	93.87	1,408.05			0
	E-discovery - storage											
02/28/2022	DISB	087	Relativity External User Fee for e-Discovery - storage		2767	94.76	1,421.40	94.76	1,421.40			0
	E-discovery - storage											
02/28/2022	DISB	110	Relativity Data Hosting Fee		2767	0.00	66.25	0.00	66.25			0
	E-discovery - services											
Report Totals:					87163	3,086.07	871.63	3,086.07	871.63			

March 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Org_qty	Orig_Amt	Rev_qty	Rev_Amt	Vendor	Voucher	Chac_No.
03/01/2022	DISB	003		Filing & recording fees	2698	0.00	1,445.85	0.00	1,445.85	GERALD HANSON & ASSOCIATES, INC.	2756572	397144
				Transcript fees -- vendor: gerald hanson & associates, inc.								
03/07/2022	DISB	027		Professional services	2698	9.00	25.40	9.00	25.40		0	
				Pacer charges net charges								
03/09/2022	DISB	051		Copying/printing	2380	1.00	0.15	0.00	0.15		0	
				Copy expense # 2								
03/31/2022	DISB	087		Relativity External User Fee for e- Discv	2767	97.84	1,467.60	97.84	1,467.60		0	
				E-discovery - storage								
03/31/2022	DISB	110		Relativity Data Hosting Fee	2767	5.24	655.00	5.24	655.00		0	
				E-discovery - services								
				Report Total:		13.08	3,594.00	112.08	3,594.00			

May 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM Task	Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Qty	Rev Amt	Vendor	Voucher	Check No.
05/04/2022	DISB	051		Copying/printing		2394	173.00	25.95	173.00	25.95		0
05/04/2022	DISB	006		Postage		2767	0.00	9.25	0.00	9.25		0
05/09/2022	DISB	051		Copying/printing		2698	206.00	30.90	206.00	30.90		0
05/16/2022	DISB	039		Westlaw search - in contract		2996	0.00	100.06	0.00	100.06		0
05/17/2022	DISB	051		Copying/printing		2698	42.00	6.30	42.00	6.30		0
05/27/2022	DISB	051		Copying/printing		2698	39.00	5.85	39.00	5.85		0
05/31/2022	DISB	027		Professional services		2020	6.00	8.20	6.00	8.20		0
	Pacer charges net charges			Filing & recording fees		2698	0.00	350.00	0.00	350.00	JUDITH MILLER	2759531
05/31/2022	DISB	003		Filing fees -- vendor: judith miller								398657
05/31/2022	DISB	087		Relativity External User Fee for e-Discovery		2767	100.86	1,512.90	100.86	1,512.90		0
	E-discovery - storage											
05/31/2022	DISB	110		Relativity Data Hosting Fee		2767	0.00	92.50	0.00	92.50		0
	E-discovery - services											
05/31/2022	DISB	051		Copying/printing		2869	463.00	69.45	463.00	69.45		0
	Copy expense # 2											
	Report Totals:						1,079.86	2,211.36	1,079.86	2,211.36		

June 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

July 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

August 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Marker	SMT	Task	Service Code	Description	Attorney	Long Qty	Orig Amt	Rev Amt	Rev Amt Vendor	Voucher	Check No.
08/01/2022	DISB			051	Copying/printing		2996	183.00	27.45	183.00		27.45
	Copy expense # 2										0	0
08/17/2022	DISB			039	Westlaw search - in contract		2815	3.00	247.88	3.00		247.88
	Westlaw charges										0	0
08/24/2022	DISB			051	Copying/printing		2996	42.00	6.30	42.00		6.30
	Copy expense # 2										0	0
Report Totals:								228.00	281.63	228.00		281.63

September 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SMTask	ServiceCode	Description	Attorney	Orig Amt	Orig Amnt	Rev Amnt	Rev Amnt	Vendor	Voucher	Check No.
09/09/2022	Pacer charges net charges	DISB	027	Professional services		2582	5.00	2.10	5.00		0	0
09/30/2022	E-discovery - storage	DISB	087	Relativity External User Fee for e- Discv		2767	97.73	1,465.95	97.73	1,465.95	0	0
09/30/2022	Westlaw charges	DISB	039	Westlaw search - in contract		2996	4.00	121.37	4.00	121.37	0	0
Report Totals:						106.73	1,589.42	.0673	1,589.42			

October 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Org Qty	Org Amt	Rev Amt	Rev Vend	Voucher	Check No.
10/11/2022	DISB	051		Copying/printing	2687	3.00	0.45	3.00	0.45		0
	Copy expense # 2										0
10/20/2022	DISB	051		Copying/printing	2869	36.00	5.40	36.00	5.40		0
	Copy expense # 2										0
10/31/2022	DISB	087		Relativity External User Fee for e- Discv	2767	100.96	1,514.40	100.96	1,514.40		0
	E-discovery - storage										0
10/31/2022	DISB	110		Relativity Data Hosting Fee	2767	5.54	692.50	5.54	692.50		0
	E-discovery - services										0
	Report Totals:					145.50	2,212.75	145.50	2,212.75		

November 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Org Amt	Rev Amt	Rev Qty	Vend	Voucher	Check No.
11/02/2022	DISB	006		Postage	2869	0.00	7.92	0.00	7.92		0
	Postage expense										
11/09/2022	DISB	051		Copying/printing	2869	79.00	11.85	79.00	11.85		0
	Copy expense # 2										
11/21/2022	DISB	051		Copying/printing	2996	13.00	1.95	13.00	1.95		0
	Copy expense # 2										
11/30/2022	DISB	087		Relativity External User Fee for e- Discy	2767	95.85	1,437.75	95.85	1,437.75		0
	E-discovery - storage										
11/30/2022	DISB	110		Relativity Data Hosting Fee	2767	3.94	492.50	3.94	492.50		0
	E-discovery - services										
Report Total:						19.79	19.79	19.79	19.79		195.97

December 2022

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Tas	Service Code	Description	Attorney	Orig Amt	Rev Amt	Vendor	Voucher	Check No.
12/01/2022	DISB Copy expense # 2	051		Copying/printing	2869	319.00	47.85	319.00	47.85	0
12/01/2022	DISB Deposition/transcript, GERALD HANSON & ASSOCIATES INC., Hanson Invoice re Mark Gray Statement on the Record (11-22-2022)	043		Deposition/transcript	2996	0.00	263.90	0.00	263.90	GERALD HANSON & ASSOCIATES, INC.
12/02/2022	DISB Copy expense # 2	051		Copying/printing	2869	19.00	2.85	19.00	2.85	0
12/02/2022	DISB Postage	006		Postage	2869	0.00	2.43	0.00	2.43	0
12/06/2022	DISB Transcript fees -- vendor: gerald hanson & associates, inc.	003		Filing & recording fees	2698	0.00	929.00	0.00	929.00	GERALD HANSON & ASSOCIATES, INC.
12/08/2022	DISB Pacer charges net charges	027		Professional services	2582	6.00	4.30	6.00	4.30	0
12/12/2022	DISB Transcript fees -- vendor: gerald hanson & associates, inc.	003		Filing & recording fees	2698	0.00	1,360.80	0.00	1,360.80	GERALD HANSON & ASSOCIATES, INC.
12/14/2022	DISB Copy expense # 2	051		Copying/printing	2704	2.00	0.30	2.00	0.30	0
12/20/2022	DISB Westlaw charges	039		Westlaw search - in contract	2996	0.00	237.60	0.00	237.60	0
12/27/2022	DISB Copy expense # 2	051		Copying/printing	8992	109.00	16.35	109.00	16.35	0
12/31/2022	DISB E-Discovery - Tech Support	087		Relativity External User Fee for e- Discv	2767	0.00	1,437.75	0.00	1,437.75	0
12/31/2022	DISB E-Discovery - Storage	110		Relativity Data Hosting Fee	2767	0.00	1,730.00	0.00	1,730.00	0
						455.00	6,033.13	455.00	6,033.13	
										Case:20-01946-JWB Doc#:583 Filed: 10/02/2023 Page 296

January 2023

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Orig QTY	Orig Amt	Rev Qty	Rev Amt	Vendor	Voucher	Check No.
01/06/2023	DISB	051		Copying/printing	2996	143.00	21.45	143.00	21.45		0	0
				Copy expense # 2								
01/11/2023	DISB	081		Search	2582	0.00	4.90	0.00	4.90		0	0
01/11/2023	DISB	085		ESI discovery	2698	0.00	1,500.00	0.00	1,500.00	KL Discovery Ontrack LLC	2770250	14415385
				ESI discovery								
01/11/2023	DISB	081		Search	2698	0.00	0.80	0.00	0.80		0	0
01/12/2023	DISB	043		Deposition/transcript	2698	0.00	1,446.70	0.00	1,446.70	GERALD HANSON & ASSOCIATES INC.	2765225	13385
				Deposition/transcript, GERALD HANSON & ASSOCIATES INC., Invoice for Mark Gray Vol 2 Transcript								
01/13/2023	DISB	051		Copying/printing	9922	16.00	2.40	16.00	2.40		0	0
				Copying/printing								
01/14/2023	DISB	051		Copying/printing	9922	16.00	2.40	16.00	2.40		0	0
				Copying/printing								
01/16/2023	DISB	051		Copying/printing	9922	54.00	8.10	54.00	8.10		0	0
				Copying/printing								
01/17/2023	DISB	051		Copying/printing	9922	18.00	2.70	18.00	2.70		0	0
				Copying/printing								
01/18/2023	DISB	051		Copying/printing	9922	19.00	2.85	19.00	2.85		0	0
				Copying/printing								
01/19/2023	DISB	062		Federal Express	2869	0.00	22.35	0.00	22.35		0	0
				Federal Express								
01/19/2023	DISB	062		1Z17A5050108094647-Next Day Air Residential	2869	0.00	5.85	0.00	5.85		0	0
				1Z17A5050108094647-Residential Surchage								
01/19/2023	DISB	062		Federal Express	2869	0.00	5.22	0.00	5.22		0	0
				Federal Express								
01/19/2023	DISB	062		1Z17A5050124170695-Next Day Air Commercial	2869	0.00	22.35	0.00	22.35		0	0
				1Z17A5050124170695-Fuel Surchage								
01/19/2023	DISB	062		Federal Express	2885	0.00	4.14	0.00	4.14		0	0
				Federal Express								
01/19/2023	DISB	051		Copying/printing	9922	4,849.00	727.35	4,849.00	727.35		0	0
				Copying/printing								
01/20/2023	DISB	062		Federal Express	2582	0.00	19.29	0.00	19.29		0	0
				Federal Express								
01/20/2023	DISB	062		Federal Express	2582	0.00	16.00	0.00	16.00		0	0

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

February 2023

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

Date	Matter	SM/Task	Service Code	Description	Attorney	Org/Qty	Orig Amt	Rev Oth	Rev Amnt	Vendor	Voucher	Check No.
02/09/2023	DISB	007	Mileage	Mileage	2698	0.00	182.22	0.00	182.22	PAUL HAGE		2769291 999082010
				Mileage, PAUL HAGE, Mileage to/from mediation			0.00	182.22	0.00			
				Report Total:					182.22			

March 2023

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

August 2023

Cost Report

THOMAS BRUINSMA, CHAPTER 7 TRUSTEE OF (TBC7BV)

EXHIBIT 9-A
(Distel Time and Expenses)

Distel Thiede Advisory Services, LLC / Amicus Management
 1500 E Beltline SE Suite 100 / Suite 140
 Grand Rapids, MI 49506
 616-954-2000



INVOICE

BILL TO		INVOICE	12082241
Taft, Stettinius, & Hollister LLP		DATE	01/31/2023
Judith Greenstone Miller		TERMS	Due on receipt
27777 Franklin Rd., Ste. 2500		DUE DATE	01/31/2023
Southfield, MI 48034			

Date	Employee	Service	Description	Qty	Rate	Amount
11/10/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Review of potential avoidance actions under Sections 544 - 549 of the Code.	1	300.00	300.00
11/16/2022	David J Distel	Barfly Ventures:B170	Review contents in Storage of documents for expert work with Paul Neitzel and Avoidance Action Analysis - DD Chris Peirce from Rock Creek Advisors.	1.3	300.00	390.00
11/20/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Read Mark Sellers deposition; take notes.	1.3	300.00	390.00
11/29/2022	David J Distel	Barfly Ventures:B170	Read deposition of Mark Sellers and interview notes from Jeff Forum; prepare Avoidance Action Analysis - DD related correspondence to Judith Greenstone Miller.	2.5	300.00	750.00
11/30/2022	David J Distel	Barfly Ventures:B170	Discuss case with Judy Greenstone Miller, Kim Clayton, and Paul Neitzel including Avoidance Action Analysis - DD observations in depositions.	0.5	300.00	150.00
11/30/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Read emails sent by Kim Clayton and adversary complaint.	0.7	300.00	210.00
12/01/2022	David J Distel	Barfly Ventures:B170	Review and analyze document and analysis in the virtual Rock Creek Advisors Avoidance Action Analysis - DD data storage room.	1.5	300.00	450.00
12/02/2022	David J Distel	Barfly Ventures:B170	Continued review and analysis documents provided in Rock Creek Advisors data Avoidance Action Analysis - DD storage room.	1.5	300.00	450.00
12/03/2022	David J Distel	Barfly Ventures:B170	Continued review and analysis of Rock Creek Advisors data storage Avoidance Action Analysis - DD documents/analyses.	3.2	300.00	960.00
12/03/2022	David J Distel	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - DD 549 of the Code.	1	300.00	300.00
12/04/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Review and analysis of complaint.	1.3	300.00	390.00
12/04/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Review and analysis of insolvency documents prepared by Rock Creed Advisors.	2.5	300.00	750.00
12/04/2022	David J Distel	Barfly Ventures:B170	Review and analyze audited financial statements and other unaudited financial Avoidance Action Analysis - DD statements.	1.8	300.00	540.00
12/04/2022	David J Distel	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - DD 549 of the Code.	1	300.00	300.00
12/05/2022	David J Distel	Barfly Ventures:B170	Meeting with Judy Greenstone Miller (Jaffe), and Paul Neitzel and Chris Peirce (Rock Creek Advisors) to discuss documentation requested, answer questions, and Avoidance Action Analysis - DD discuss next steps.	1	300.00	300.00
12/06/2022	David J Distel	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - DD 549 of the Code.	1	300.00	300.00
12/06/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Document review and prepare for meeting with counsel and Rock Creek Advisors.	0.7	300.00	210.00
12/14/2022	David J Distel	Barfly Ventures:B170	Follow up meeting with Judy Greenstone Miller, Kim Clayton, Paul Neitzel, and Chris Peirce to discuss information needs, meeting prep with Tom Bruinsma, and Avoidance Action Analysis - DD follow-up.	0.83	300.00	249.00
12/14/2022	David J Distel	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - DD 549 of the Code.	1	300.00	300.00
12/14/2022	David J Distel	Barfly Ventures:B170	Meeting with Plante and Moran, Judy Greenstone Miller, Kim Clayton, Paul Neitzel, Avoidance Action Analysis - DD and Chris Peirce, to discuss information needs.	1	300.00	300.00
12/16/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Prepare for meeting with Tom Bruinsma, Trustee.	1	300.00	300.00
12/16/2022	David J Distel	Barfly Ventures:B170	Meeting to discuss progress with Tom Bruinsma, Trustee, Judy Greenstone Miller, Avoidance Action Analysis - DD Kim Clayton, Paul Neitzel, and Chris Peirce.	1.2	300.00	360.00
12/27/2022	David J Distel	Barfly Ventures:B170	Correspond with Judith Greenstone Miller, regarding scheduling meetings and Avoidance Action Analysis - DD availability.	0.2	300.00	60.00
12/27/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Review and analyze Plante Moran working papers from 2014 to 2018.	6.3	300.00	1,890.00
12/28/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Continued Plante Moran document review and analysis.	1.36	300.00	408.00
12/28/2022	David J Distel	Barfly Ventures:B170	Continued review of Plante Moran working papers and preparation for meeting with Avoidance Action Analysis - DD Tom Bruinsma, Trustee.	1.6	300.00	480.00

			Meeting with Tom Bruinsma, Kim Clayson, Judy Greenstone Miller, Paul Neitzel, and Chris Peirce to discuss status of work, missing information, Avoidance Action Analysis - DD damage calculation, schedule, and other related matters.	1.2	300.00	360.00
12/28/2022	David J Distel	Barfly Ventures:B170	Prepare follow up correspondence with Plante Moran representative Jeff Bailey to Avoidance Action Analysis - DD request additional information needed for review and analysis.	0.3	300.00	90.00
12/29/2022	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Rock Creek Advisors 'Trustee' folder documentation review and analysis.	1.5	300.00	450.00
12/30/2022	David J Distel	Barfly Ventures:B170	Direct Greg Simsa regarding case and documents to analyze, and analysis to Avoidance Action Analysis - DD prepare. (Greg Simsa did not charge his time for this activity.)	1.4	300.00	420.00
12/30/2022	David J Distel	Barfly Ventures:B170	Document review and analysis including Mark Seller's note, and related debt, and Avoidance Action Analysis - DD covenant compliance documents.	1.8	300.00	540.00
01/05/2023	David J Distel	Barfly Ventures:B170	Telephone call with Rock Creek Advisor representatives, Paul Neitzel and Chris Peirce, to review, analyze, and discuss schedules from deposition and damage Avoidance Action Analysis - DD computations.	1	300.00	300.00
01/05/2023	David J Distel	Barfly Ventures:B170	Meeting with Judy Miller, Kim Clayson, Paul Neitzel, Chris Peirce, and Thomas Bruinsma, Trustee, to discuss status of case, damage computation, insolvency Avoidance Action Analysis - DD matters, deposition updates, and other relevant matters.	2.3	300.00	690.00
01/06/2023	David J Distel	Barfly Ventures:B170	Telephone call with Judy Greenstone Miller and Greg Simsa to discuss Mark Avoidance Action Analysis - DD Seller's obligations. (Greg Simsa did not charge his time for this activity.)	0.7	300.00	210.00
01/06/2023	David J Distel	Barfly Ventures:B170	Telephone call with Rock Creek Financial Advisor representatives Paul Neitzel/Chris Peirce and Greg Simsa to discuss information availability, insolvency analysis, and damage calculation. (Greg Simsa did not charge his time for this activity.)	0.7	300.00	210.00
01/06/2023	David J Distel	Barfly Ventures:B170	Working session with Greg Simsa to review case, information available, and Avoidance Action Analysis - DD discuss solvency analysis.	2.4	300.00	720.00
01/06/2023	Greg Simsa	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	5	250.00	1,250.00
01/08/2023	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Review all available deposition transcripts.	2.6	300.00	780.00
01/09/2023	David J Distel	Barfly Ventures:B170	Correspond with Legal Team, Rock Creek Advisors, and Tom Bruinsma regarding Avoidance Action Analysis - DD status of insolvency work.	0.3	300.00	90.00
01/09/2023	David J Distel	Barfly Ventures:B170	Meeting with Paul Neitzel, Chris Peirce, and Greg Simsa to discuss information requests, insolvency analysis, and damage computation. (Greg Simsa did not charge his time for this activity.)	1.3	300.00	390.00
01/10/2023	David J Distel	Barfly Ventures:B170	Balance Sheet review and analysis of audited/reviewed financial statements; Avoidance Action Analysis - DD preparation of updates to insolvency analysis.	3.6	300.00	1,080.00
01/10/2023	David J Distel	Barfly Ventures:B170	Accounts payable multi-month trend aging analysis and prepare related graphs Avoidance Action Analysis - DD outlining insolvency over time.	3.8	300.00	1,140.00
01/10/2023	Greg Simsa	Barfly Ventures:B170	Continued review of potential avoidance actions under Sections 544 - 549 of the Code.	1	250.00	250.00
01/11/2023	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Review and analyze monthly financial statements and prepare insolvency analysis.	2.7	300.00	810.00
01/11/2023	David J Distel	Barfly Ventures:B170	Analysis of monthly and annual leasehold and land improvements and incorporate Avoidance Action Analysis - DD into insolvency analysis.	1.8	300.00	540.00
01/11/2023	David J Distel	Barfly Ventures:B170	Correspond with Legal Team, and Rock Creek advisors regarding status of Avoidance Action Analysis - DD insolvency analysis.	0.3	300.00	90.00
01/11/2023	David J Distel	Barfly Ventures:B170	Correspond and telephone calls with Plante Moran representative Jeff Bailey Avoidance Action Analysis - DD regarding information needs, and review of files delivered.	1	300.00	300.00
01/11/2023	David J Distel	Barfly Ventures:B170	Review Congruent credit agreements and discuss covenant computations with Avoidance Action Analysis - DD Greg Simsa.	1.5	300.00	450.00
01/11/2023	David J Distel	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - DD 549 of the Code.	1	300.00	300.00
01/11/2023	Greg Simsa	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00
01/12/2023	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Preparation of updates to insolvency analyses.	2.2	300.00	660.00
01/12/2023	David J Distel	Barfly Ventures:B170	Review and analysis of insolvency analysis including updates to schedules and Avoidance Action Analysis - DD graphs.	2.6	300.00	780.00
01/12/2023	Greg Simsa	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00
01/12/2023	Greg Simsa	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00
01/13/2023	David J Distel	Barfly Ventures:B170	Meeting with Judy Greenstone Miller, Kim Clayson, Tom Bruinsma, Paul Neitzel, Avoidance Action Analysis - DD Chris Peirce, and Greg Simsa to discuss Damage Calculation.	1.5	300.00	450.00
01/13/2023	David J Distel	Barfly Ventures:B170	Avoidance Action Analysis - DD Telephone call with Judy Greenstone Miller to discuss potential testimony.	0.4	300.00	120.00
01/13/2023	David J Distel	Barfly Ventures:B170	Prepare updates to insolvency analysis before meeting with Legal Team and Tom Bruinsma, Trustee.	1.9	300.00	570.00
01/13/2023	Greg Simsa	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00
01/13/2023	Greg Simsa	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00
01/13/2023	Greg Simsa	Barfly Ventures:B170	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00

01/14/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD graphs.	Analysis and preparation of debt and working capital analyses; prepare related Create and update graphs for meeting with Legal Team and Tom Avoidance Action Analysis - DD Bruinsma/Trustee.	3.6	300.00	1,080.00
01/14/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD Bruinsma/Trustee.	Meeting with Judy Miller, Kim Clayton, Tom Bruinsma, Paul Neitzel, Chris Pearce, Avoidance Action Analysis - DD and Greg Simmsa to discuss Insolvency analysis.	1.7	300.00	510.00
01/14/2023	David J Distel	Barfly Ventures:B170 Expense	Quality control review Dave Distel's work product for accuracy of Altman-Z score, Business Expenses Edward Altman ZScore Book (online download) needed in connection with Operations -GS Insolvency analysis.	1.8	300.00	540.00
01/15/2023	Greg Simmsa	Barfly Ventures:B210 Business Operations -GS	Quality control review Dave Distel's work product for accuracy of Altman-Z score, working capital and related graph and debt data and related graph.	0.3	250.00	75.00
01/16/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD	Meeting with Judy Greenstone Miller, Kim Clayton, Tom Bruinsma, Paul Neitzel, Avoidance Action Analysis - DD Chris Pierce and Greg Simmsa to discuss insolvency analysis/schedules.	1.5	300.00	450.00
01/16/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD	Create and update graphs for meeting with Legal Team and Tom Prepare exhibits to Trustee mediation brief.	2.2	300.00	660.00
01/16/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD	Modify Barfly insolvency analyses and related computations.	4.4	300.00	1,320.00
01/16/2023	Greg Simmsa	Barfly Ventures:B170 Avoidance Action Analysis - GS	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00
01/17/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD	Review initial draft of Trustee Brief, edit, and provide comments.	1.36	300.00	408.00
01/18/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD	Continued review and edit revisions to Trustee brief.	1.3	300.00	390.00
01/19/2023	David J Distel	Barfly Ventures:B170 Expense	Avoidance Action Analysis - DD Continued review and edit revisions to Trustee brief before mediation. Breakfast for entire team to prepare in advance of mediation.	1.2	300.00	360.00
01/19/2023	Expense	Barfly Ventures:Reimbursable Expenses	IBIS World Craft Beer, Beer Distribution, and Bar and Restaurant Reports for analysis of Industry for insolvency analysis.	1	136.17	136.17
01/20/2023	Expense	Barfly Ventures:B110 Case Administration - DD	Mediation preparation meeting with Judy Greenstone Miller, Kim Clayton, Paul Hage, Tom Bruinsma, Paul Neitzel, and Chris Pearce.	3	365.00	1,095.00
01/21/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD	Independent research in Craft Beer, Beer Distribution, and Bar and Restaurant Avoidance Action Analysis - DD Industries to support insolvency analysis.	1.5	300.00	450.00
01/23/2023	David J Distel	Barfly Ventures:B110 Case Administration - DD	Participate in Mediation/Settlement; Ready to provide testimony to mediator.	9	350.00	3,150.00
01/23/2023	David J Distel	Barfly Ventures:B170 Avoidance Action Analysis - DD	Pre-Mediation preparation time with Judy Greenstone Miller, Paul Hage, Kim Avoidance Action Analysis - DD Clayton, Paul Neitzel, Chris Pearce, Greg Simmsa and Tom Bruinsma.	2	300.00	600.00
01/23/2023	Greg Simmsa	Barfly Ventures:B170 Expense	Continued review and analysis of potential avoidance actions under Sections 544 - Avoidance Action Analysis - GS 549 of the Code.	1	250.00	250.00
01/23/2023	Expense	Barfly Ventures:Copies	Copies of documents noted in this invoice.	1414	0.25	353.50
BALANCE DUE						\$ 39,686.67

FEE APPLICATION SUMMARY	Hours	Rate	Total
David J Distel	102.65	\$ 300.00	\$ 30,795.00
David J Distel	10.5	\$ 350.00	\$ 3,675.00
Matt Thiede	0	N/A	\$ -
Greg Simmsa	14.3	\$ 250.00	\$ 3,575.00
Starla McDonald	0	N/A	\$ -
Expenses	0	N/A	\$ 1,641.67
FEE APPLICATION SUMMARY TOTAL			\$ 39,686.67

EXHIBIT 9-B
(Distel Hourly Rates)

DISTEL HOURLY RATES**DAVID J. DISTEL**

Year	Hourly Rate	Hours Billed	Total Amount
2022	\$300.00-\$350.00	44.49	\$13,347.00
2023	\$300.00-\$350.00	68.66	\$21,123.00
TOTAL		113.15	\$34,470.00

GREG SIMSA

Year	Hourly Rate	Hours Billed	Total Amount
2022	N/A	N/A	N/A
2023	\$250.00	14.3	\$3,575.00
TOTAL		14.3	\$3,575.00

EXHIBIT 9-C
(Distel Biographies)



David J. Distel, CPA/ABV/CFF, CTP

With over 30 years of experience, **David J. Distel** is a Partner and Senior Managing Director for Distel Thiede Advisory Services, LLC, a strategic, financial, and operational advisory firm. Mr. Distel's practice includes Growth Strategies, Performance Improvement, Transaction Support, Turnaround & Restructuring, and Interim Management. Over his career, he has served in the roles of CEO, CFO, COO, CRO, and Financial Advisor in private industry and consulting. Most recently, from 2014 to 2019 as Chief Executive Officer, Mr. Distel successfully led two money losing companies and grew the top and bottom lines. He is skilled at quickly assessing situations and finding the most impactful levers to positively change the profitability, cash flows, and cultures of companies.

Prior to Mr. Distel's recent CEO run, he was a Partner and Senior Managing Director with another strategic advisory firm for 10 years, where he led strategic projects and turnarounds serving as Interim Chief Executive Officer, Chief Restructuring Officer, Chief Liquidation Officer, and financial advisor for his clientele both inside and outside of bankruptcy. Prior to that, Mr. Distel served spent over 15 years with Deloitte's audit and mergers & acquisitions consulting practices serving Deloitte's largest clients, and as CFO and COO of both privately and publicly traded operating companies.

Mr. Distel's has won six professional industry awards on his client assignments. He is well respected and recognized within the consultancy industry and holds a license as a Certified Public Accountant, Accreditation in Business Valuation, Certification in Financial Forensics, and Certified Turnaround Professional. He is the original founding President of the Turnaround Management Association in West Michigan and is involved in various professional, community and philanthropic organizations.

Gregory E. Sims, MBA, CMA | Managing Director

Greg Sims is a Certified Management Accountant and Managing Director at Distel Thiede Advisory Services, LLC with primary responsibility for providing and managing engagements in the areas of accounting and finance. He is an accomplished executive, with many years of experience in financial leadership and general management roles in middle market companies, leading under-performing companies through transitions to achieve consistent profitability while managing company risk.

Prior to Mr. Sims transitioning to consulting, he served 15+ years in the capacities of CFO, CRO and General Manager of middle market companies and 11+ years in various finance roles at large market companies (office furniture). He is an expert at assessing and understanding the fundamental problems a business faces and providing and executing plans to effectively address these issues.

Mr. Sims provides clients with a range of expert services in accounting and finance, including cash flow, budgeting, forecasting, cost/management accounting, price/margin analysis, break-even analysis, risk management, lender relationships, internal controls, process development, and development of staff.

Mr. Sims holds a master's degree, with honors, in business administration from the Eli Broad College of Business at Michigan State University and a bachelor's degree in accounting, with honors, from Ferris State University.

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

BARFLY VENTURES, LLC, *et al.*¹
Debtors.

Chapter 7
Hon. James W. Boyd
Consolidated
Case No. 20-01947

**NOTICE OF FIRST INTERIM FEE APPLICATION OF TAFT STETTINIUS &
HOLLISTER, LLP FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES AS COUNSEL TO THOMAS BRUINSMA, CHAPTER 7
TRUSTEE OF BARFLY VENTURES, LLC, ET AL. FOR THE PERIOD
FROM MAY 19, 2021 TO AUGUST 31, 2023**

Notice is hereby given that the following professional persons have made application to the United States Bankruptcy Court for the Western District of Michigan for allowance and payment of fees and expenses incurred for the period from May 19, 2021 through August 31, 2023, as listed below:

Professional (name and address):	Taft Stettinius & Hollister, LLP 27777 Franklin, Suite 2500 Southfield, MI 48034
Fees requested:	\$601,718.00
Authorizing to compromise and pay:	\$300,859.00
Expenses requested:	\$40,255.13

¹ The substantively consolidated debtors are: Barfly Ventures, LLC (8379), Barfly Management, LLC (6274), 9 Volt, LLC (d/b/a HopCat) (1129), 50 Amp Fuse, LLC (d/b/a Stella's Lounge) (3684), GRBC Holdings, LLC (d/b/a Grand Rapids Brewing Company) (2130), E L Brewpub, LLC (d/b/a HopCat East Lansing) (5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago, LLC (7552), HopCatConcessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat-GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat-Indianapolis, LLC (d/b/a HopCat-Broad Ripple) (7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a HopCat,-KC, LLC and Tikicat) (6242), HopCat-Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), HopCat-Royal Oak, LLC (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House, LLC and McFadden's Restaurant Saloon) (4255).

Fees and expenses previously allowed by Court:	None. This is the first interim fee application filed by counsel.
Additional Expenses Requested – Distel Thiede Advisory Services, LLC	
Professional (name and address):	Distel Theide Advisory Services, LLC 1500 E. Beltline SE Suite 100 Grand Rapids, Michigan 49506
Fees requested:	\$38,045.00
Authorizing to compromise and pay:	\$19,022.50
Expenses Requested:	\$1,641.67

PLEASE NOTE: The application is available for public review at the Clerk's Office, One Division North, Grand Rapids, Michigan, Monday through Friday, from 8:00 a.m. – 4:00 p.m. No hearing will be set before the Court unless a written objection to this application is timely filed with the Clerk of the Bankruptcy Court. If you have any objection, you have 21 days from the date of service of this notice in which to file such written objection. If an objection is filed, a subsequent notice will be sent to you of the date, time and location of the hearing on the objection.

ANY OBJECTION MUST BE TIMELY FILED WITH:

United States Bankruptcy Court
One Division North
Grand Rapids, Michigan 49503

A COPY OF ANY OBJECTION MUST ALSO BE SENT TO:

Taft Stettinius & Hollister, LLP
Attn: Judith Greenstone Miller and Kimberly Ross Clayson
27777 Franklin, Suite 2500
Southfield, Michigan 48034
jgmiller@taftlaw.com
kclayson@taftlaw.com

Respectfully submitted by,

TAFT STETTINIUS & HOLLISTER, LLP

By: /s/ Judith Greenstone Miller

Judith Greenstone Miller (P29208)

Paul R. Hage (P70460)

Kimberly Ross Clayson (P69804)

27777 Franklin, Suite 2500

Southfield, MI 48034

(248) 351-3000

jgmiller@taftlaw.com

phage@taftlaw.com

kclayson@taftlaw.com

*Counsel to Thomas Bruinsma, in his capacity as
Chapter 7 Trustee of Barfly Ventures, LLC, et al.*

Dated: October 2, 2023

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

BARFLY VENTURES, LLC, *et al.*¹
Debtors.

Chapter 7
Hon. James W. Boyd
Consolidated
Case No. 20-01947

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023, my office electronically filed the *First Interim Fee Application of Taft Stettinius & Hollister, LLP for Payment of Compensation and Reimbursement of Expenses as Counsel to Thomas Bruinsma, Chapter 7 Trustee for Barfly Ventures, LLC, et al. for the Period of May 19, 2021 through August 31, 2023* with the Clerk of the Court which sends notice by operation of the Court's electronic filing service to all ECF participants registered to receive notice in this case.

¹ The substantively consolidated debtors are: Barfly Ventures, LLC (8379), Barfly Management, LLC (6274), 9 Volt, LLC (d/b/a HopCat) (1129), 50 Amp Fuse, LLC (d/b/a Stella's Lounge) (3684), GRBC Holdings, LLC (d/b/a Grand Rapids Brewing Company) (2130), E L Brewpub, LLC (d/b/a HopCat East Lansing) (5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago, LLC (7552), HopCatConcessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat-GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat-Indianapolis, LLC (d/b/a HopCat-Broad Ripple) (7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a HopCat,-KC, LLC and Tikicat) (6242), HopCat-Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), HopCat-Royal Oak, LLC (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House, LLC and McFadden's Restaurant Saloon) (4255).

Respectfully submitted by,

TAFT STETTINIUS & HOLLISTER, LP

By: /s/ Judith Greenstone Miller

Judith Greenstone Miller (P29208)

Paul R. Hage (P70460)

Kimberly Ross Clayson (P69804)

27777 Franklin, Suite 2500

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kclayson@taftlaw.com

*Counsel to Thomas Bruinsma, in his capacity as
Chapter 7 Trustee of Barfly Ventures, LLC, et al.*

Dated: October 2, 2023